

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

JULI WINTJEN, *on behalf of herself and all
others similarly situated,*

Plaintiff,

v.

DENNY'S, INC., *et al,*

Defendant.

Case No. 2:19-cv-00069-CCW

DECLARATION OF JAMES M. PIETZ, ESQ.

Pursuant to 28 U.S.C. § 1746, I, James M. Pietz, hereby declare as follows:

1. My name is James Pietz. I have been a member in good standing of the bars of the State of Illinois since 1988 and the Commonwealth of Pennsylvania since 1989. I am admitted to practice before the United States Supreme Court as well as the Second, Third, Fifth, Sixth, Seventh, Eighth, Tenth and the District of Columbia Federal Circuit Courts of Appeal. I am also admitted to practice by the United States District Court for the Northern District of Illinois and the Western District of Pennsylvania.

2. I have been given the highest possible rating (AV) by the Martindale-Hubbell Law Directory.

3. I am a graduate of Marquette University (1982) and the Chicago-Kent College of Law (1987).

4. I am a member of the National Association of Consumer Advocates. (www.naca.net).

5. I have practiced complex class action law in the Pittsburgh area for the last 35 years.

6. I am currently a partner with the law firm of Feinstein, Doyle, Payne & Kravec, LLC. (“FDPK”) (www.fdpklaw.com). I joined this firm as a partner on January 1, 2016, where my work focuses on representing consumers in complex class action litigation.

7. I am submitting this Declaration in support of the fee application of Lynch Carpenter LLP. I have been engaged in handling complex plaintiff class litigation not only in the Pittsburgh marketplace, but also in many other jurisdictions around the United States. Based upon my experience with many complex class action counsel fee petitions, I am familiar with the market rates charged by contingent fee counsel for class action litigation. In addition, I have become familiar with the awards made by Federal and State trial judges for attorney fees in class action and individual consumer litigation, and have a good understanding of the hourly rates they consider appropriate for consumer litigation in general both in individual and class consumer protection and employment cases. I also have periodically reviewed various attorney fee billing surveys to determine the rates that attorneys or law firms are customarily billing.

8. As stated by the court in *Kaymark v. Udren Law Offices, P.C.*, Civil Action No. 13-41; 2019 U.S.Dist.LEXIS 224703, at *27 (W.D.Pa. Feb. 5, 2019):

The undersigned has also reviewed the Declaration of James Pietz. (ECF No. 216-4). Mr. Pietz is an attorney with a substantial consumer credit litigation practice in the Pittsburgh area, and is intimately familiar with local billing rates. Mr. Pietz declares that the rates requested are fair and reasonable billing rates in the Pittsburgh market for lawyers of comparable skill and experience to the Petitioners.

My experience in complex class litigation in Pittsburgh and elsewhere is fully described below.

2016 to the Present

9. Currently, I am working as plaintiffs' class counsel in several class actions pending in Allegheny County and the W.D. Pa. I am working as one of the plaintiffs' class co-counsel in *Hernandez v. United States Steel*, GD-19-005325, a class action alleging that U.S. Steel engaged in negligence and nuisance as a result of a fire that occurred at its plant in the Mon Valley. On May 12, 2023, Hon. Judge Ignelzi granted class certification for a class consisting of the 22 class-area communities and appointed FDPK as one of the Class Counsel. I am also currently co-counsel in 5 related putative class actions alleging that persons in Pennsylvania or their agents were overcharged in obtaining copies of their medical records by medical record reproduction companies. These cases include *Landay v. Ciox fna Healthport* GD-09-012919; *Landay v. Ciox fna IOD* Case No. GD-09-012922; *Landay. vs. UPMC Presbyterian Shadyside*, Case No. GD-09-012919; *Wayne M. Chiurazzi Law Inc. vs. IOD Corporation*; *Anthony C. Mengine Law Inc. vs. Magee-Womens Hospital of University of Pittsburgh Medical Center*, Case No. GD-09-014785. I am also co-counsel in a consumer class action asserting claims that a bank illegally assessed Return of Deposited Item fees to bank account holders. *Spencer v. PNC Bank, N.A.* 24-cv-357-RJC.

10. I am also currently working as co-counsel in class actions pending in California alleging that automobile insurance companies are engaged in violations of the California anti-discrimination in connections with the setting of automobile insurance rates.

11. Since joining FDPK, I have worked on other class actions brought in Allegheny County and the W.D.Pa. *Dahy v. FedEx Ground Package Sys.* No. 2:17-cv-1633, 2018 U.S.Dist.LEXIS 224910 (W.D.Pa. 2018) remanded to Allegheny Common Pleas at NO. GD-17-

015638; *Danganan v. Guardian Prot. Servs.* (3d Cir. 2018) 742 F.App'x 634; *Rossini v. PNC Fin. Servs. Grp., Inc.*., No. 2:18-cv-1370)2020 U.S. Dist. LEXIS 113242 (W.D. Pa); *Walker v. Highmark BCBS Health Options, Inc.*., No. 2:20-CV-01975-CCW) 2021 U.S. Dist. LEXIS 271019 (W.D. Pa. May 14, 2021)

2007 to 2015

12. Prior to joining FDPK, I established Pietz Law Office, LLC. From 2007 to 2015, this firm concentrated its practice in consumer protection and complex class action litigation.

13. In this time period, I was appointed class action counsel in a number of class actions, including cases brought under the Fair Credit Reporting Act. (“FCRA”). I was appointed class counsel in one of the first reported class certifications under the FCRA. *See Campos v. ChoicePoint Services, Inc.* 237 F.R.D. 478 (N.D.Ga. 2006) (noting that the action was one of the first cases to enforce the “file disclosure” requirement of the FCRA, and that my adequacy as class counsel was not an issue).

14. I successfully prosecuted other novel, precedent-setting class actions under the FCRA. *See, e.g., Gillespie v. Equifax*, 484 F.3d 938 (7th Cir. 2007) (finding Equifax violated the requirement that a file disclosure be “clear”). I was also lead counsel in a class action seeking to enforce the FCRA’s requirements applicable to an employer’s use of consumer reports to assess the qualifications of prospective employees. *Reardon v. Closetmaid Corp.*, 2011 WL 1628041, at *1 (W.D. Pa. Apr. 27, 2011) (memorandum opinion granting class certification). *Reardon* involved an issue of first impression of whether an employer willfully violates the FCRA by incorporating a release or waiver of rights provision within the required disclosure/consent form to be signed by the prospective employer. *Reardon v. Closetmaid Corp.*, 2013 WL 6231606, at *1 (W.D. Pa. Dec. 2, 2013).

15. I was appointed class counsel in a consumer class action involving the alleged illegal forced placement of property insurance. *Wahl v. ASIC*, 08-555 (N.D. Cal.). Pietz Law Office was co-counsel in an action, certified for settlement purposes, alleging the negligent supervision of a hospital employee *Hoyman v. UPMC*, GD-12-16636 (Allegheny Cty. 2012). I have also been appointed in other cases raising similar allegations. *See Haluska v. Forbes*, 05-09134 (Allegheny Cty, Pa.) and *Alwine v. SHEC*, GD 12-018715. Pietz Law Office was appointed Plaintiffs' Class Counsel for purposes of a settlement class in *Vincent v. Wolpoff & Abramson*, 08-423 (W.D.Pa. 2008).

1990 to 2007

16. Before establishing Pietz Law Office, I had been employed by the law firm of Malakoff, Doyle & Finberg, P.C. ("MDF") for 17 years from January 1990 until January 2007. MDF or its predecessors had been engaged in prosecuting class actions since 1972. In my work at MDF, I was principally responsible for the prosecution of seven actions involving the allegedly illegal sale and financing of campground timeshare interests. With respect to this litigation, I worked as class counsel in the following cases: *See Zaazouh v. Bank One*, C.A., No. 89-145 (W.D. Pa. 1989); *Conley v. Bank One*, 4:91-CV-0251 (N.D. Ohio 1991); *Rudnik v. Cortland*, 1120 of 1990 C.D. (Fayette Cty. 1990); *Gogola v. FirstSouth*, No. 1121 of 1990 (Fayette County, Pa. 1990) and *McDonagh v. GEICO Financial*, 4:93 CV 1352 (N.D. Ohio); *Isaak v. Trumbull Savings and Loan*, 4:93 CV 1121 (N.D. Ohio) and *Slentz v. Cortland*, C.A. 4:93 CV 1480 (N.D. Ohio 1993).

17. Additionally, I was principally responsible for handling the firm's prosecution of actions against Metropolitan Life Insurance Company alleging the fraudulent and deceptive sale of life insurance policies. *see, e.g., State ex. rel. Metropolitan Life v. Starcher*, 196 W.Va. 519,

474 S.E.2d 476 (1996); *Wolbert v. Metropolitan Life*, No. 95-0861 (W.D. Pa.); *Cope v. Metropolitan Life*, 82 Ohio St.3d 426, 696 N.E.2d 1001 (1998). These actions ultimately resulted in the national class settlement at *In Re: Metropolitan Life Insurance Sales Practice Litigation*, 1999 U.S. Dist. Lexis 22688, MDL No. 1091 (W.D. Pa.).

18. I also handled numerous appeals in the state and federal courts many of which involved significant, systemic issues in complex consumer class litigation. *Martin v. Franklin Capital*, 393 F.3d 1143 (10th Cir. 2004) (what standard applies under 28 U.S.C. § 1447 for awarding attorneys' fees and costs for defendants' erroneous removal); *Gayman v. Principal Life*, 311 F.3d 851 (7th Cir. 2002) (whether demutualization of life insurer pursuant to state law constitutes "state action" within the meaning of 42 U.S.C. § 1983.); *LaBarre v. Credit Acceptance*, 175 F. 3d 640 (8th Cir. 1999) (whether McCaren-Ferguson Act barred claim under RICO, 18 U.S.C. §1962(c)); *Stewart v. National Education Assoc.*, 05-7140 (D.C. Cir. 2006) (whether demutualization consideration attributable to a group life insurance policy must be held exclusively for the benefit of the insureds under the policy).

Lynch Carpenter LLP's Rates

19. I have reviewed the hourly rates listed by Lynch Carpenter in their application for approval of attorneys' fees and costs, including \$1,100 for Managing Partner Gary Lynch, \$950 for Partner Kelly Iverson, \$900 for Partner Jamisen Etzel, \$900 for Partner Elizabeth Pollock-Avery, and \$900 for Of Counsel Katie Horigan. Based on my experience and knowledge and, upon review of the certifications and credentials submitted by counsel, I believe the hourly rates charged by in this matter are appropriate and constitute reasonable market rates. As an experienced complex class action litigator, I am familiar with the contingency fee and hourly rates typically charged by attorneys in class action matters. In my experience, absent contingent

fees and the foregoing hourly rates, plaintiffs in such cases would have difficulty obtaining competent and experienced counsel to handle their claims. In addition, the rates charged are consistent with those charged by other firms handling complex class litigation, and fit within the rate charged by attorneys experienced in such matters.

20. My determination is based upon the following. *First*, the court in *In re Philips Recalled CPAP, Bi-Level PAP, & Mech. Ventilator Prods. Liab. Litig.*, No. 21-1230) 2024 U.S.Dist.LEXIS 220053, at *134.) (W.D.Pa. Dec. 5, 2024) determined that the same Lynch Carpenter hourly rates were reasonable as part of the court's cross check analysis of the attorneys' lodestar. In particular, the court determined that using all the rates of plaintiffs' counsel from associate to partner level, the fee applicants blended rate was \$785.85. Using the same analysis here, Lynch Carpenter's blended rate equates to \$542.70. Based upon my knowledge and experience this number is well below the rates applicable to experienced complex class action attorneys in Pittsburgh. By comparison, in 2014, an attorney fee expert had determined my rate as a complex class action attorney in the Pittsburgh market to be approximately \$525. See Exhibit A attached.

21. *Second*, it is appropriate to examine an applicant's rates in context based upon the complexity of the case the attorney handles and the qualifications, knowledge, and skills of opposing counsel. *In re Fine Paper Antitrust Litigation* 751 F.2d 562, 587 (3d Cir. 1984) ("The request was made for the purpose of enlightening the court as to reasonable hours and hourly rates for comparable lawyers in complex litigation. The information sought certainly was relevant, and arguably even helpful."). In this regard, it has been my experience in bringing complex class actions in Western Pennsylvania that the defendant is almost invariably represented by a large, preeminent national law firm. In my cases, cited in Paragraphs 9-11

above, the defense counsel included the firms K & L Gates and the New York Office of Kirkland & Ellis (*Landay* actions); Seyfarth Shaw Chicago office (*Dahy* action); Blank Rome, Philadelphia; and Reed Smith (*Rossini* and *Walker*)

22. The rates used by Lynch Carpenter are commensurate with the rates charged by these nationally based law firms in complex class litigation cases. The National Law Journal is a widely respected national legal publication which has surveyed and tracked law firm billing rates nationwide for more than 20 years. In 2014, the NLJ noted that the *average* billing rate for partners is \$604.00 per hour (with “high” partner rates exceeding \$800 or \$900). *Gilbert v. Abercrombie & Fitch, Co.* No. 2:15-cv-2854) 2016 U.S.Dist.LEXIS 103441, at *44. (S.D.Ohio Aug. 5, 2016, These rates do not take into consideration the contingent nature, or the work involved or that the lawyers and their firms have waited for more than five years to be paid. The submitted rates compare to the experience and credentials of these attorneys and is well within the rate charged by these firms who appear in courts in Western Pennsylvania to defend complex class litigation claims. When considering the risk associated with this type of practice, and the delay, the rates charged are reasonable.

23. *Third*, the reasonableness of the rates is further confirmed by other fee survey studies. The 2022 NLJ Survey of Law Firm Economics supports the rates. Exhibit B hereto. This report indicates that the rates used by Lynch Carpenter are commensurate with the rates used by law firms in the Mid-Atlantic Region based upon years of experience and complexity of cases. Exhibit B, p. 17-19 of 20.

24. Likewise, this is confirmed with reference to the 2023 Litigation Hourly Rate Survey and Report published by the National Association Of Legal Fee Analysis. Exhibit C.

(NALFA Report). The NALFA Report distinguishes between “complex” litigation and “regular” litigation at page 22:

For our purposes, complex litigation refers to individual cases or entire practice areas that are highly technical, medical, or financial. We also consider high-stakes or bet-the-company litigation to fall within the complex realm. By contrast, regular litigation are individual cases or entire practice areas that are more routine, run-of-the-mill, straightforward, or garden variety. These cases and practice areas tend to be less technical and have less at stake or issue.

25. NALFA analyzes rates according to four factors including City, Years of Litigation Experience, Complexity of Case and Law Firm size. NALFA Report at p.13. Thus, attorneys with many years of experience in complex cases are recognized to be at a higher “Tier”. NALFA Report at p.19.

26. The NALFA Report 2023 Rate Data For Pittsburgh supports the rates used by Lynch Carpenter, including its Managing Partner and other Partners. excerpted NALFA Report at p. 94. As the background and experience of these attorneys’ attest, that they can be classified at Tier 3 or 4 with a “Complex Rate” given the work they are routinely engaged in. Thus, the rate of \$1,100 for Attorney Lynch is well within the marketplace for attorneys with his comparable skills and experience. The same can be said for Attorneys Iverson, Etzel, Pollock-Avery, Horigan. According to this Report there are 147 plaintiffs’ attorneys in Tier 3 and 4 with a Complex Rate between \$701 and \$1300 in the Pittsburgh. Exhibit C, p. 94. Given Lynch Carpenter’s preeminence as a top complex class action law firm locally and nationally, this report fully supports that these attorneys’ rates are reasonable and in accordance with the marketplace.

27. The United States Consumer Law Attorney Fee Survey Report 2017-2018 also provides a useful reference point to support the reasonableness of the rates. *See e.g. Robinson v.*

Enhanced Recovery Co., No. 18-441, 2020 U.S. Dist. LEXIS 169112, at *26 fn. 1 (E.D. Pa. Sep. 16, 2020). This Report is located online at <https://burdgelaw.com/wp-content/uploads/2021/11/US-Consumer-Law-Attorney-Fee-Survey-Report-w-Table-of-Cases-091119.pdf>. This Report shows that for attorneys handling class actions in Pennsylvania, rates of \$975 were reported as of 2016 for those in the 95% median. 2017-2018 Consumer Survey at p. 151. Again, given the years of experience and complexity of the cases being litigated by Lynch Carpenter, I believe that they would be considered as being in this preeminent category.

I declare under penalty of perjury that the foregoing is true and accurate.

Executed this 9th day of January, 2025, in Pittsburgh, Pennsylvania.

By /James M. Pietz
James M. Pietz
Pa. I.D. 55406
Feinstein Doyle Payne & Kravec, LLC.
429 Fourth Avenue, Suite 1300
Law And Finance Building
Pittsburgh, Pa. 15219
412-281-8400
jpietz@fdpklaw.com

EXHIBIT A



2000 Market Street, 20th Floor
Philadelphia, PA 19103-3222
Tel 215.299.2000 Fax 215.299.2150
www.foxrothschild.com

Abraham C. Reich
Direct Dial: (215) 299-2090
Email Address: areich@foxrothschild.com

April 29, 2014

James M. Pietz, Esquire
Pietz Law Office
429 Forbes Avenue
Suite 1710
Pittsburgh, PA 15219

RE: Billing Rates

Dear Mr. Pietz:

I. INTRODUCTION

You have asked for my expert opinion with regard to your reasonable hourly billing rates and, specifically, whether such rates are consistent with the Pittsburgh market for legal services and the Pennsylvania Rules of Professional Conduct.

II. QUALIFICATIONS

I am a partner at the law firm of Fox Rothschild LLP ("Fox Rothschild"). I have been at Fox Rothschild since 1974 as a member of its Litigation Department. I am currently Co-Chair of Fox Rothschild. For five years prior to becoming Co-Chair, I was the Managing Partner of the Philadelphia office. I have been a member of the management group at the Firm since 1985. I was the founding member of Fox Rothschild's Professional Responsibility Committee (in 1988) and served as Chair of the Committee for eight years.

As part of the management of my Firm over the past 30 years, I have participated in the review and analysis of the hourly rates that we charge for our lawyers, including those lawyers in our Pittsburgh office. This review is completed at least once a year and involves a review and

A Pennsylvania Limited Liability Partnership

California Colorado Connecticut Delaware District of Columbia
Florida Nevada New Jersey New York Pennsylvania



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analysis of the markets in which we participate to ensure that we set competitive rates and that the rates we charge are consistent with the Rules of Professional Conduct.

The process of setting hourly billable rates encompasses a number of steps. Initially, the Firm obtains public data of national, regional and local law firms' hourly billing rates. In addition, Firm management often speaks with consultants with expertise in this area to ensure the Firm's rates are within the range of its competitors in the market. Further, the management team, which comprises leaders from each of our offices, discuss the hourly billing rates in each of our markets (currently, we have 19 offices in nine states and the District of Columbia). We try to establish rates that are fair and competitive.

I have had an active litigation practice for over 40 years. The majority of my practice involves commercial litigation matters, in which I represent plaintiffs and defendants. I have also been active for many years representing lawyers and law firms in a myriad of issues involving professional responsibility and legal ethics, including the defense of legal malpractice claims. I have also been involved in dealing with fee disputes between and among lawyers and their clients. In 1998, I was selected to be a Fellow of the American College of Trial Lawyers.

In the Firm's litigation practice, we have handled matters in the area of consumer law. Our Firm has represented large financial institutions which have been sued for violations of the Fair Credit Reporting Act ("FCRA"), the Consumer Credit Protection Act ("CCPA") and the Fair Debt Collection Protections Act ("FDCPA").

For over 30 years, I have been active in the area of legal ethics and the interpretation and application of the Pennsylvania Rules of Professional Conduct (and its predecessor, the Code of Professional Responsibility). I have been a member of the Philadelphia Bar Association's Professional Responsibility Committee and its Professional Guidance Committee. In 1983 and 1984, I served as Chair of the Professional Responsibility Committee. In 1987 and 1988, I served as Chair of the Professional Guidance Committee.

I served as a member of a Hearing Committee for the Disciplinary Board of the Supreme Court of Pennsylvania for six years. For a portion of that time, I chaired the Hearing Committee. From approximately 1988 to 1995, I have also served as one of two appointed lawyers (non-judicial) liaisons to the Judicial Ethics Committee of the Pennsylvania Conference of State Trial Judges.



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I have, for many years, served on the Legal Ethics and Professional Responsibility Committee of the Pennsylvania Bar Association. For the past eight years, I have taught legal ethics and professional responsibility at the University of Pennsylvania Law School.

In 1995, I served as Chancellor of the Philadelphia Bar Association. I have been a member of the House of Delegates of the American Bar Association and the Pennsylvania Bar Association for many years. I participated in the debates surrounding the enactment of the Model Rules of Professional Conduct and many of the Amendments.

I have spoken and written on issues of trial practice and legal ethics over many years in many different forums. I have counseled hundreds of lawyers on issues of legal ethics and professional responsibility.

III. DOCUMENTS REVIEWED

I have reviewed the following documents as part of my analysis:

1. James M. Pietz's history.
2. Judge Cercone's opinion dated August 5, 2013 in *Jackson v. Allied Interstate, LLC* reported at 2013 WL 3990875 (W.D.Pa.)
3. Judge Lancaster's opinion dated January 25, 2012 in *Fross v. County of Allegheny* reported at 848 F.Supp.2d 547 (W.D.Pa. 2012)
4. Judge Cercone's opinion dated September 28, 2011 in *Vallies v. Sky Bank* reported at 2011 WL 4527312 (W.D.Pa.)
5. Arbitrator's Award re Plaintiffs' Motion for Attorney's Fees, approved and adopted by Judge Ambrose on September 4, 2009, in *Vincent v. Wolpoff & Abramson, L.L.P.*, No. 08-423-DWA (W.D.Pa.)
6. Declaration of James M. Pietz in Support of the Motion for Final Approval of the Settlement and in Support of Plaintiffs' Counsel's Motion for Attorneys' Fees and Costs filed November 11, 2008 in *Vincent v. Wolpoff & Abramson, L.L.P.*
7. Supplemental Declaration of James M. Pietz in Support of the Motion for Final Approval of the Settlement and in Support of Plaintiffs' Counsel's Motion for Attorneys' Fees and Costs in *Vincent v. Abramson, L.L.P.*



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8. Declaration of John Stember, Esquire dated August 8, 2008 in *Jones v. Barkman, Director*, No. 2:05-cv-1052 (W.D.Pa.)
9. Declaration of Michael P. Malakoff in Support of Application of Plaintiff's Counsel for Approval of Attorneys' Fees and Costs filed January 2, 2009 in *Vincent v. Wolpoff & Abramson, L.L.P.*
10. Affidavit of David F. Manogue in Support of Joint Application for an Award of Fees and Expenses dated October 26, 1999 in *In re Metropolitan Life Insurance Co.*, N. 96-179 (W.D.Pa.)
11. Declaration of Ellen M. Doyle, Esquire dated April 30, 2007 in *Choike v. Slippery Rock University of Pennsylvania of the State Higher System of Education*, No. 2:06-cv-00622 (W.D.Pa.)
12. Schedule of Fox Rothschild rates for attorneys in its Pittsburgh office
13. Judge Pratter's Memorandum and Order in *Serrano v. Sterling Testing Systems, Inc.*, No. 07-04563 (E.D.Pa.) dated May 7, 2010
14. ALM Legal Intelligence 2014 Survey Report: Billing rates and practices, a study of the Billing Rates of Attorneys in Small to Midsize Firms
15. TyMetrix press release dated July 23, 2013 re growth in lawyer rates in 2012
16. Pittsburgh Business Times column dated August 16, 2013
17. Updated Laffey Matrix
18. Consumer Price Index (All items) for Pittsburgh dated March 2014

IV. DISCUSSION

A. Your Accomplishments

You graduated from Marquette University in 1982 and the Chicago-Kent College of Law in 1987. You are admitted to practice in Illinois and Pennsylvania, and before the United States Supreme Court, the Second, Third, Fifth, Sixth, Seventh, Eighth, Tenth and the District of



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Columbia Federal Circuit Courts of Appeals. You are rated AV by Martindale-Hubbell Law Directory. You are a member of the National Association of Consumer Advocates.

Since 1990 your practice has been almost exclusively focused on consumer class actions. From December 1989 until 2007 you were employed by, or were a partner in, Malakoff Doyle & Finberg, P.C. (and its predecessor Berger, Kapetan, Malakoff & Meyers), a firm which focused on class actions. In 2007 you established your own practice as Pietz Law Office. At Malakoff, Doyle and Finberg, you concentrated in the prosecution of class actions in state and federal courts around the United States. Since establishing Pietz Law Office you have continued to focus on these types of actions.

Pietz Law Office has been appointed class action counsel or co-counsel in *Wahl v. American Security Ins. Co.*, 2009 WL 1766620 (N.D.Cal. 2009); *Reardon v. ClosetMaid*, 08-1730 (W.D.Pa.); *Vincent v. Wolpoff & Abramson*, 08-423 (W.D.Pa.); *McNulty v. Edwin Abramhansen & Assoc.*, 08-422 (W.D.Pa.); *Campos v. ChoicePoint Services*, 237 F.R.D., 478 (N.D.Ga. 2006); *Gillespie v. Equifax*, 2008 WL 461427 (N.D.Ill. 2008); *Halinska v. Forbes*, 05-09134 (Allegheny County, Pa.); and in the following putative class actions: *Tigba v. QBE*, 12-177 (C.D. Cal); *Anthony C. Mengine Law Inc. v. Healthport*, GD-09-012919; *Wayne M. Chiurazzi Law Inc. v. MRO Corporation*, No. GD-09-012911; *Wayne M. Chiurazzi Law Inc v. UPMC Presbyterian Shadyside*, No. GD-09-012919; *Wayne M. Chiurazzi Law Inc. v. IOD Corporation*, GD-09-012922; *Anthony C. Mengine Law Inc v. Magee-Women's Hospital of University of Pittsburgh Medical Center*, No. GD-09-014785; *Anthony C. Mengine Law Inc. v. Healthport*, 2:09-cv-01109-GLL (W.D.Pa.)

You have handled numerous appeals in state and federal courts involving significant, systemic issues in complex class litigation.

B. Methodology for Determining Rates

In my opinion, there are two complimentary approaches for determining reasonable hourly rates.

The **first approach** is to consider the rates for comparably skilled practitioners in the relevant market and rates approved by courts for your work. To that end, I have reviewed the hourly billing rates of lawyers who do class action work.

Witold J. Walczak, Esquire's hourly rate of \$500 was deemed reasonable in January 2012. *Fross v. County of Allegheny*, 848 F.Supp.2d 547 (W.D.Pa. 2012).



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Michael J. Malakoff, Esquire's hourly rate of \$540 was deemed reasonable in September 2011. *Vallies v. Sky Bank*, 2011 WL 4527312 (W.D.Pa. Sept. 28, 2011).

John Stember, Esquire's hourly rates of \$475, \$450 and 400 were approved between 2006 and 2008. Declaration of John Stember in *Jones v. Barkman, Director*, No. 2:04-cv-1053 (W.D.Pa. Aug. 8, 23008).

Howard A Specter charged \$495 per hour in 1999. Affidavit of David F. Manogue in *In re Metropolitan Life insurance Co.*, No. 960179 (W.D.Pa. Oct. 26, 1999).

Ellen M. Doyle opined in 2007:

I am personally aware of the rates charged by competent, experienced practitioners in class action matters in western Pennsylvania, including lawyers who represent plaintiffs and those who represent defendants. Lead counsel from Pittsburgh firms normally bill at hourly rates ranging from \$325 to \$550 in these types of matters. *Choike v. Slippery Rock University*, No. 2:06-cv-00622-DWA (W.D.Pa.).

In 2012 the average hourly rate of partners in the Pittsburgh region was \$450, up from \$429 in 2010 according to a survey conducted by the Pittsburgh Business times and the Association of Corporate Counsel's Western Pennsylvania chapter.

In *Vincent v. Wolpoff & Abramson* you requested an hourly rate of \$410. The arbitrator awarded, and the court approved, an hourly rate of \$400 in 2009. In *Jackson v. Allied Interstate, LLC* Judge Cercone stated:

. . . the National Law Journal Billing Survey reflected general hourly rates in the Pittsburgh market ranging from a high of \$790 for partner to a low of \$150 for an associate. *Jackson v. Allied Interstate, LLC*, 2013 WL 3990875 (W.D.Pa. Aug. 5, 2013).

In *Wahl v. American Security Ins. Co.*, No. 08-555 (N.D.Cal.) you submitted a fee petition in which you requested \$500 per hour. The Judge approved your requested attorney's fees.

In 2010 Judge Pratter stated:

The Attorneys concentrate their practice in the area of consumer protection litigation, and their hourly rates (ranging from between \$290.00 and \$650.00) are within the range charged by attorneys with comparable experience levels for consumer class action



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litigation of similar nature.” *Serrano v. Sterling Testing Systems, Inc.*, Co. 07-4563 (E.D.Pa. May 7, 2010).

Finally, I consulted the hourly rates of lawyers listed in the Updated Laffey Matrix.¹ For the period of June 2013 to May 2014, the hourly billing rate identified for an attorney with twenty or more years of experience is \$771.

A second approach to determine a reasonable hourly rate would look at the relevant factors set forth in Rule 1.5(a) of the Rules of Professional Conduct.

While the Pennsylvania Rules of Professional Conduct do not specifically address the reasonableness of a specific hourly rate, they do address the considerations for assessing “the propriety of a fee” in Rule 1.5. In my opinion, some of those considerations can provide a useful analytical checklist when trying to determine a reasonable hourly rate.

The factors set forth in Rule 1.5(a) are:

1. Whether the fee is contingent or fixed;
2. The time and labor required, the novelty and difficulty of the questions involved, and the skill requisite to perform the legal services properly;
3. The likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the lawyer;
4. The fee customarily charged in the locality for similar legal services;
5. The amount involved and results obtained;
6. The time limitations imposed by the client or by the circumstances;
7. The nature and length of professional relationship with the client; and
8. The experience, reputation and ability of the lawyer or lawyers performing those services.

¹ The Laffey Matrix is reflective of market rates in the Baltimore/Washington area. See www.laffeymatrix.com. In my experience, the rates in the Baltimore/Washington area are higher than the rates in the Pittsburgh Market.



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Factor Number 4 ("The fee customarily charged in the locality for similar legal services") has already been addressed. This is a comparative review of rates charged by other lawyers in the market.

Factor Number 1 ["whether the fee is contingent on fixed"] suggests that higher rates may be justified when fees are contingent. The Pietz Law Office handles most of its cases on a contingent fee basis. As a result, the firm bears all the risk of the cost of litigation until resolution. In some instances, the firm may not receive payment of its fees for several years. Further, most of the defendants are large companies with substantial financial resources and lawyers equipped to defend the actions. Many of the lawsuits address novel areas of law. In order to obtain favorable outcomes, you spend numerous hours conducting research, conducting discovery, and crafting innovative legal arguments to overcome attempts to have their clients' cases dismissed before trial. Your investment of time and resources prevents you from litigating numerous matters at the same time.

Factor Number 2 ["The time and labor required, the novelty and difficulty of the questions involved and the skill requisite to perform the legal services properly"], also supports the notion that a higher rate would be justified for you since you have distinguished yourself in your area of expertise. Finally, Factor Number 8 ["The expertise, reputation and ability of the lawyer or lawyers performing those services"], likewise provides another reason to justify increasing rates recommended for you.

Your hourly billing rates for the past ten years through the present have been:

2003-05	\$ 390
2006-08	\$ 410
2010	\$ 420
2011-14	\$ 500

V. CONCLUSION

In accordance with the foregoing analysis, and based upon my review of the prevailing market hourly billing rates in Pittsburgh, it is my opinion, within a reasonable degree of professional certainty, that the range of hourly billing rates for James M. Pietz from \$475 to \$525 is consistent with the hourly billing rates charged in the Pittsburgh market and within the considerations outlined in the Pennsylvania Rules of Professional Conduct. The level of hourly



James M. Pietz, Esquire
April 29, 2014
Page 9

billing rates within the range will depend on the complexity of the matter, the duration of the dispute and the result obtained.

If I am provided with additional information, I reserve the right to supplement or amend my opinion.

Very truly yours,

A handwritten signature in black ink that appears to read "Abraham C. Reich".

Abraham C. Reich

EXHIBIT B

2022 EDITION

The 50th Annual Survey of Law Firm Economics

LAW FIRM
FINANCIALS

HOURLY
RATES

BILLABLE
HOURS

TOTAL
COMPENSATION

STAFFING
RATIOS

THE NATIONAL LAW JOURNAL

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PERFORMANCE

THE SURVEY OF LAW FIRM ECONOMICS

2022 Edition

Conducted and Published by

THE NATIONAL LAW JOURNAL

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INTRODUCTION

The *National Law Journal's Survey of Law Firm Economics, 2022 Edition* (based on 2021 data) is one of the most comprehensive, accurate and up-to-date set of economic statistics and financial data available for the legal profession. This year's survey contains information from 2,799 lawyers at 30 U.S. law firms. In its 50th year, the survey remains an invaluable tool for managers at law firms.

To be a useful tool, the survey must provide the relevant information required by the law firm managers. ALM Intelligence partners with the International Paralegal Management Association each year to develop and publish a more comprehensive tool for managing paralegal positions. If you are interested in paralegal data, please contact ALM Intelligence for product information and pricing.

ALM Intelligence is committed to meeting the information needs of the legal profession and, as such, invites you as a purchaser and/or participant to call or write us with your candid critique, suggestions and questions. The survey will continue to improve only through our ability to understand your evolving needs for information. We invite you to contact us with any thoughts and/or questions. E-mail us at almlegalintel@alm.com.



USE OF THE SURVEY

The survey is designed to provide the information necessary for law firm managers to evaluate their firm's performance relative to comparable law firms. The statistics included in the survey represent broad performance benchmarks against which an individual firm can be measured. Using this information, law firm management can compare their firm's performance and figures with those of the profession as a whole, as well as with firms of similar size, geographic location, population, practice specialty, and other data points.

This survey is particularly useful to firm management, administrators, strategic planners and office or department heads who are able to efficiently develop comparative analyses of the various statistical data with their firm's data. Many are experienced in development of these analyses and in development of effective presentation charts and graphs. However, over the years we have encountered others who have found the analysis more difficult. Accordingly, we have developed a program that will prepare customized tabulation of your data against relative benchmarks.

RECOMMENDED APPROACH TO DEVELOPMENT OF COMPARATIVE DATA

At first glance, the survey may seem to contain an overwhelming volume of information. However, if you follow the suggested steps, you should be able to easily develop useful, meaningful comparisons.

Step 1 - Collection of Your Firm's Data

The first step in using the survey is to develop your firm's data for fiscal year 2021. This is best accomplished by using a copy of your survey response form and worksheet. The questionnaire used in the study is included at the end of this Survey report. A review of the questions used will enable you to better understand the data herein and to make optimal use of the survey.

Step 2 - Calculate Per Lawyer or Fee Earner Statistics and Other Ratios

The second step is to calculate the various performance indicators and ratios using the data compiled in Step 1. It is important to calculate all data using the same formulae which were used to produce the data in the survey. Most information is presented in a per equity partner, per lawyer or per fee earner format. For example, to develop per lawyer gross receipts you would divide the total firm income for the year by the total number of full-time equivalent (FTE) lawyers. FTEs are defined in the questionnaire.

Example - Per Lawyer

$$\frac{\text{Total Gross Receipts} \quad \$10,000,000}{\text{Total FTE Lawyers} \quad 50} = \frac{\$200,000}{\text{Per Lawyer}}$$

Per fee earner gross receipts would be calculated by dividing the total firm income for the year by the total number of (FTE) lawyers plus one half of the full-time equivalent paralegal staff. A further explanation of the per-equity partner, per-lawyer and per-fee

eamer format is provided in the financial section.

Example - Fee Earner

Total Gross Receipts	<u>\$10,000,000</u>	=	\$181,818
Total FTE Lawyers	55	Per Fee Earner	
+ One Half FTE Paralegal			
Staff (10 FTE Paralegals x .5 = 5)			

Any level of performance requires certain trade-offs. Very high dollars may require extraordinarily long hours, tremendous expertise, superlative results and even luck. On the other hand, if performance results are lacking, there may be areas where improvement simply to levels customarily achieved in other law firms will provide impressive returns.

Step 3 - Evaluating Results

Next, assess your firm's performance with the survey results of comparable firms in terms of size, location, similar population base and legal specialty. As you do so, several points should be recognized.

A deviation between your firm's figures (for any performance measure) and numbers in the report is not necessarily good or bad. It merely indicates that additional analysis may be required. As a rule, the larger the difference, the greater the need for further investigation.

In situations where large deviations do exist, it may be helpful to calculate the same performance measure over the past several years to identify trends that may exist.

The information in this survey should be used as guidelines rather than absolute standards. Firms differ, as does their mix of practice specialties, location, size and other factors. Any two firms can be successful, yet have very different experiences with regard to certain performance measures.

TREND DATA

This survey contains a *snapshot* of the economic performance of the legal profession for 2021. However, the best analysis of a firm's economic performance and position occurs through evaluation of trend information. Selected trend information is provided in each section of the survey. For more complete historical data, we recommend prior copies of the survey that are available at reduced prices to those who wish to compare their firm on a trend basis. Quotes on prices for copies of past surveys can be obtained by contacting ALM Intelligence at (888) 770-5647.

TERMS AND DEFINITIONS

In order to obtain maximum value from this survey, it is important to understand what the information means and how to best use it. Following are explanations of some of the data and definitions used in the report. We have also provided brief comments on the statistical terms used.

Billable Hours

For those persons who regularly report billable hours, hours recorded during the reporting year, which were chargeable to clients (i.e., billable work).

Billing Rates

Most commonly assigned, or standard hourly rate as of January 1, 2022.

Compensation

Salary/Draw

For Professional Corporations/Associations:

Salary-Federal taxable income amount shown on W-2 plus voluntary before-tax employee reductions for:

- 401(k) plans;
- Flexible spending accounts (FSAs);
- Other qualified flexible benefit programs.

For Partnerships/Proprietorships:

Draw-Periodic cash distributions including quarterly tax draws and guaranteed payments.

Bonus/Distribution in Cash

For Professional Corporations/Associations:

Bonus-Year end cash bonus paid during 2021.

For Partnerships/Proprietorships:

Distribution-Cash distribution to partners.

Cash Compensation

Salary plus Bonus.

Benefits/Distribution in Kind

For Professional Corporations/Associations:

Nontaxable benefit costs, which include: qualified profit sharing plans, life, health and disability insurance, medical reimbursement plans, employer payroll taxes (including FICA) and pension contributions. Excludes auto, parking, memberships and CLE expenses.

For Partnerships and Proprietorships:

Report distribution in kind (firm payments for benefits on behalf of the partners).

Total Compensation

Salary/Draw, Bonus/Distribution in Cash, plus Benefits/Distribution in Kind.

Firm Specialization

These specialized firms derived 50% or more of their gross receipts from one area of legal work. This survey reports areas of specialization in the financial section as follows:

- Commercial Litigation
- Insurance Defense Litigation
- Labor/Employment
- General (no area responsible for 50% or more)
- Other

Lawyer Specialization

The questionnaire requests information on any legal specialty in which each reported individual spent more than half of his/her billable time. The list of specialties requested is shown below. It is not an exhaustive list, but enables some analysis of the relative earnings of various specialty groups.

Non-Litigation	Litigation
100 = Admin/Legislative/Reg.	200 = Antitrust
101 = Banking	201 = Bankruptcy
102 = Bankruptcy	202 = Collections
103 = Collections	203 = Comm./Contracts
104 = Commercial/Contract	204 = Criminal
105 = Education	205 = Education
106 = Employee Benefits	206 = Insured Defense
107 = Employment	207 = Self-insured Defense
108 = Environmental	208 = Employee Benefits
109 = Family Law	209 = Employment
110 = General Business	210 = Environmental
111 = Health Care	211 = Family Law
112 = Insurance	212 = Health Care
113 = Intellectual Property	213 = Intellectual Property
114 = International	214 = International
115 = Labor/Management	215 = Labor/Management
116 = Labor/Union	216 = Labor/Union
117 = Maritime	217 = Maritime
118 = Merger/Acquisitions	218 = Natural Resource
119 = Municipal Finance	219 = Personal Injury
120 = Natural Resources	220 = Products Liability
121 = Real Estate	221 = Real Estate
122 = Securities	222 = Securities
123 = Taxation	223 = Taxation
124 = Trust/Estates/Probate	224 = Trust/Estates/Probate
125 = Utilities	225 = Workers' Compensation
126 = Other Non-litigation Spec.	226 = Other Litigation Spec.
127 = Multi Non-litigation Spec.	227 = Multi Litigation Spec.
	300 = Generalist

Multioffice Firms

Multioffice law firms are shown as a separate category within the financial section wherever information is segregated by firm size, region and size of municipality. Within the category of MULTIOFFICE law firms, each firm is treated as a single entity. In addition, each multiple office firm is treated as a separate unit within the reporting categories of size, location, and population in this section.

When reporting information in the remaining sections of the report, each individual fee earner is re-categorized according to the region of employment. For example, a firm's main office is in Minneapolis, and the branch office is in Sarasota, Florida. The individual fee earner information is reported as South Atlantic.

Offices

The term OFFICES indicates the number of law firm offices reported within a category. Branch offices are counted as single offices.

Geographic Regions

Regions are determined using geographic divisions as defined by the U.S. Census Bureau (see map following introduction). Puerto Rico and the Virgin Islands are included with "South Atlantic;" Hawaii and Alaska with "Pacific."

Status

10	Equity Partner/Shareholder/Proprietor
11	Non-Equity Partner, Salaried Partner, Non-Participating Partner - Any individual who is held out to the public as a partner or principal, but is clearly in a separate class that is characterized as having lower capital contribution requirements, lesser voting rights and lesser economic risk or reward potential. May be classified as either a W-2 employee or K-1 partner for tax purposes.
20	Associate Lawyer - A lawyer employed by the firm who is understood to be in a program leading to consideration for partnership or shareholder status, or who has been so considered.
21	Staff Lawyer - A lawyer employed by a law firm who is hired with the understanding that the position will not lead to consideration for ownership status.
30	Counsel - (of counsel) working actively; normally over 800 billable hours.

In analysis titled "*By Individual Status*," each status code is listed separately. This breakout is shown **only** at the national level. In the remaining analyses, the heading *Partner/Shareholder-Equity/Non-Equity* includes partners in partnerships, shareholders in professional corporations/ associations and sole proprietors. This would include equity and non-equity positions. The heading *Associate/Staff* includes associate and staff attorney positions defined earlier.

STATISTICAL TERMS USED

The statistical terms used in the survey are defined below and illustrated in the example. Quartiles are used to define the middle 50% of the range. One quarter of the observations lies below the **first or lower quartile** (or 25th percentile). One quarter lies above the **third or upper quartile** (or 75th percentile). In some tables the **ninth decile** (or 90th percentile) is also shown; 10% of cases lie above this point.

The **median** (or 50th percentile) is the middle or central number in a series of numbers arranged in order of value. In the following example, the median is 50. There are equal numbers of smaller and larger observations.

The **average** (or mean) is the total value of all observations divided by the number of observations. This number may be distorted by a few outliers, as is the case in our example. The mean is useful in hourly rates and in billable hours, because few outliers are possible. It is not as good a measure for comparisons of earnings.

Example	
Item No.	Amount
1.	400 (Outlier)
2.	90
3.	80 – 75 th percentile or upper quartile
4.	70
5.	60
6.	50 – Median or 50 th percentile
7.	45
8.	40
9.	30 – 25 th percentile or lower quartile
10.	20
11.	10

Average is 82
Middle range is 30 to 80

INFORMATION ABOUT THE RESPONDENT SET

This study is undertaken annually. An invitation to participate was sent to a selected group of law firms. These are firms that have had prior contact with ALM Legal Intelligence and include past participants and purchasers of our various surveys. Invitations to participate were also sent to various members of the Association of Legal Administrators and other mailing lists.

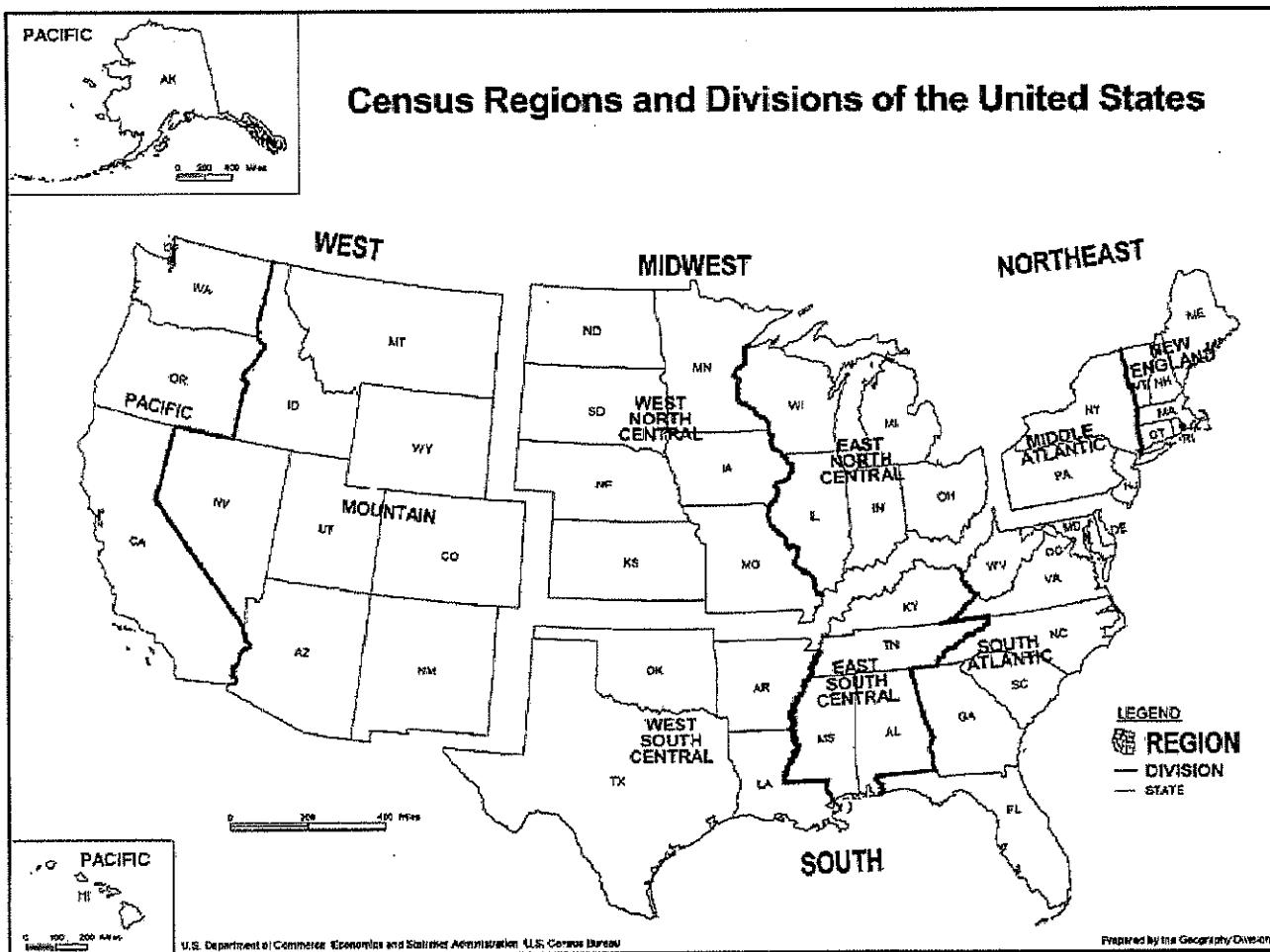
Only U.S. law firms are included in this study. Sole practitioners are included in this report. Therefore any trending data such as firm financials, compensation or billing rates will not be completely trendable with previous editions of the survey. To accommodate this group, ALM Legal Intelligence has a separate data cut for firm sizes 10 attorneys or less.

Information was collected in several areas for each lawyer who worked at the participating law firm in 2021. Earnings and billable

hours information is included only for individuals who worked full-time for all of 2021.

Statistics are not shown for any category that does not have information supplied by at least three individual positions. The number of firms or offices and number of positions are indicated on the tables as appropriate.

In some instances, the sum total of percentage breakouts may not equal 100%, because numbers have been rounded to the nearest one-tenth of one percent.



DISTRIBUTION OF PARTICIPATING LAW FIRMS

		Region				
		Northeast	Midwest	South	West	Total
Narrow Region	New England	1	-	-	-	1
	Middle Atlantic	8	-	-	-	8
	East North Central	-	8	-	-	8
	West North Central	-	3	-	-	3
	East South Central	-	-	1	-	1
	West South Central	-	-	1	-	1
	South Atlantic	-	-	4	-	4
	Mountain	-	-	-	1	1
	Pacific	-	-	-	3	3
Firm Size	1 to 9 Lawyers	-	2	-	-	2
	10 to 24 Lawyers	2	1	1	1	5
	25 to 40 lawyers	1	2	-	-	3
	41 to 75 Lawyers	1	3	1	1	6
	76 to 150 Lawyers	2	-	3	-	5
	Over 150 Lawyers	2	2	-	1	5
Practice Area	Commercial litigation	2	1	2	1	6
	Corporate/Commercial (non-litigation)	1	1	1	1	4
	Environmental	1	-	-	-	1
	Family	-	2	-	-	2
	General Law, practice in multiple areas of law	-	1	-	-	1
	Healthcare	1	-	-	-	1
	Insurance defense litigation	1	1	1	-	3
	Intellectual Property/Patent	-	2	-	-	2
	Mergers and Acquisitions	-	1	-	-	1
	Other (please specify)	2	-	1	1	4
	Plaintiffs Contingency Litigation	1	-	-	-	1
	Real Estate and Land Use	-	1	1	1	3
Type of Firm	Limited Liability Company (LLC)	2	-	-	-	2
	Limited Liability Partnership (LLP)	3	9	2	3	17
	Partnership (may include individual PCs)	-	1	-	-	1
	Professional Corporation/Association	4	1	2	1	8
	Professional Limited Liability Company (PLLC)	-	-	2	-	2
Total		9	11	6	4	30

DISTRIBUTION OF LAWYERS BY OFFICE FOR PARTICIPATING LAW FIRMS

		Region				
		Northeast	Midwest	South	West	Total
Narrow Region	New England	70	-	-	-	70
	Middle Atlantic	545	-	-	-	545
	South Atlantic	-	-	467	-	467
	West South Central	-	-	121	-	121
	East North Central	-	365	-	-	365
	West North Central	-	36	-	-	36
	Mountain	-	-	-	95	95
	Pacific	-	-	-	334	334
Firm Size	10 to 24 Lawyers	9	-	3	-	12
	25 to 40 lawyers	17	-	-	-	17
	41 to 75 Lawyers	-	29	21	1	51
	76 to 150 Lawyers	90	-	82	-	172
	Over 150 Lawyers	499	372	482	428	1781
Practice Area	Commercial litigation	433	334	495	153	1415
	Corporate/Commercial (non-litigation)	17	14	-	219	250
	Environmental	90	-	5	-	95
	Family	-	15	1	-	16
	Insurance defense litigation	9	-	3	-	12
	Intellectual Property/Patent	63	38	7	57	165
	Other	3	-	-	-	3
	Real Estate and Land Use	-	-	77	-	77
Type of Firm	Limited Liability Company (LLC)	195	-	47	-	242
	Limited Liability Partnership (LLP)	318	401	456	429	1604
	Professional Corporation/Association	102	-	82	-	184
	Professional Limited Liability Company (PLLC)	-	-	3	-	3
Total		615	401	588	429	2033

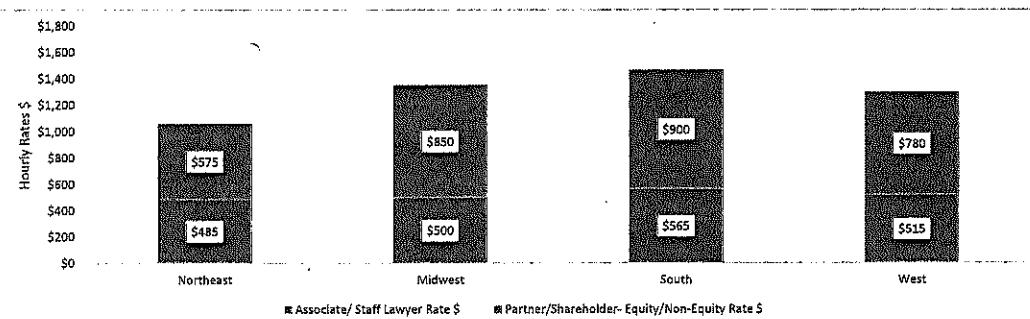
STANDARD HOURLY BILLING RATES

This section presents standard billing rates for equity partners and shareholders, non-equity partners and shareholders, associates and staff lawyers. Information is collected for each lawyer on the "individual's most commonly used hourly rate as of January 1, 2022. Law firms frequently employ this rate, usually called the Standard Rate, in their budgeting practices. Years of experience is calculated in this section from the year admitted to bar. Average billing rates, as well as quartiles and ninth decile data, are reported as follows:

Trend Comparison – Senior Partners vs. Mid-level Associates
Charts-Median Standard Hourly Rate
National
Gender
Ethnicity
Region
Firm Size
Year Admitted to Bar
Years Legal Experience
Individual Lawyer Non-Litigation Specialties
Individual Lawyer Litigation Specialties

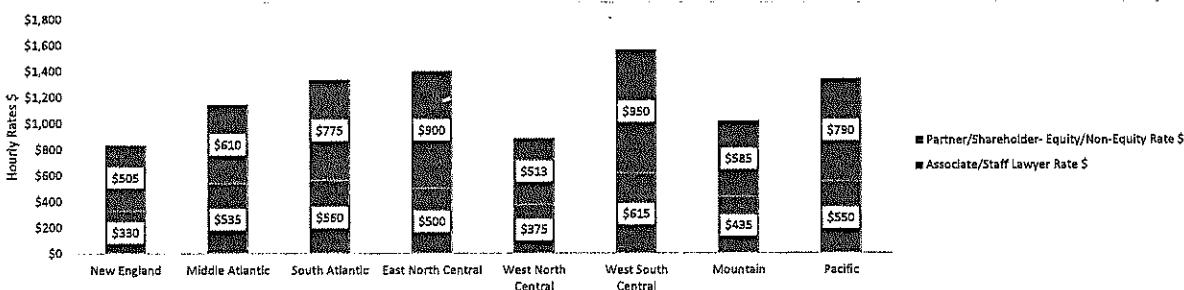
MEDIAN FOR STANDARD HOURLY RATE BY BROAD REGION
for Status Codes Partner/Shareholder-Equity/Non-Equity and Associate/Staff Lawyer

Broad Region	Partner/Shareholder- Equity/Non-Equity	Associate/ Staff Lawyer
	Rate \$	Rate \$
Northeast	\$575	\$485
Midwest	\$850	\$500
South	\$900	\$565
West	\$780	\$515



MEDIAN FOR STANDARD HOURLY RATE BY NARROW REGION
for Status Codes Partner/Shareholder-Equity/Non-Equity and Associate/Staff Lawyer

Narrow Region	Partner/Shareholder- Equity/Non-Equity	Associate/Staff Lawyer
	Rate \$	Rate \$
New England	\$505	\$330
Middle Atlantic	\$610	\$535
South Atlantic	\$775	\$560
East North Central	\$900	\$500
West North Central	\$513	\$375
West South Central	\$950	\$615
Mountain	\$585	\$435
Pacific	\$790	\$550



BROAD REGION
STANDARD HOURLY BILLING RATES
 As of January 1, 2022

Broad Region/Status		Number of Offices	Number of Lawyers	Rate				
				Average	Lower Quartile	Median	Upper Quartile	Ninth Decile
Northeast	Equity Partner/Shareholder/Proprietor	6	125	\$668	\$455	\$530	\$715	\$1,245
	Non-equity Partner/Salaried Partner/Non-Participating Partner	5	211	\$719	\$450	\$620	\$1,005	\$1,155
	Associate Lawyer	7	206	\$543	\$320	\$485	\$750	\$925
	Staff Lawyer	2	21	\$534	\$440	\$495	\$590	\$745
	Of Counsel	4	38	\$750	\$495	\$693	\$1,000	\$1,155
Midwest	Equity Partner/Shareholder/Proprietor	4	59	\$875	\$575	\$990	\$1,090	\$1,150
	Non-equity Partner/Salaried Partner/Non-Participating Partner	4	114	\$793	\$585	\$770	\$990	\$1,150
	Associate Lawyer	4	146	\$563	\$400	\$565	\$715	\$780
	Staff Lawyer	1	45	\$406	\$290	\$455	\$475	\$475
	Of Counsel	2	35	\$771	\$690	\$740	\$850	\$1,150
South	Equity Partner/Shareholder/Proprietor	5	111	\$709	\$490	\$570	\$1,040	\$1,160
	Non-equity Partner/Salaried Partner/Non-Participating Partner	9	185	\$865	\$690	\$910	\$1,050	\$1,160
	Associate Lawyer	6	197	\$590	\$410	\$600	\$755	\$850
	Staff Lawyer	3	30	\$439	\$385	\$395	\$510	\$570
	Of Counsel	5	64	\$810	\$613	\$820	\$950	\$1,080
West	Equity Partner/Shareholder/Proprietor	3	89	\$794	\$710	\$775	\$810	\$950
	Non-equity Partner/Salaried Partner/Non-Participating Partner	3	97	\$826	\$650	\$800	\$990	\$1,160
	Associate Lawyer	3	181	\$560	\$435	\$515	\$675	\$780
	Of Counsel	4	23	\$715	\$515	\$685	\$820	\$1,000

NARROW REGION
STANDARD HOURLY BILLING RATES
 As of January 1, 2022

Narrow Region/Status		Number of Offices	Number of Lawyers	Rate				
				Average	Lower Quartile	Median	Upper Quartile	Ninth Decile
New England	Equity Partner/Shareholder/Proprietor	2	19	\$507	\$460	\$505	\$540	\$625
	Non-equity Partner/Salaried Partner/Non-Participating Partner	3	18	\$521	\$425	\$525	\$575	\$700
	Associate Lawyer	4	24	\$349	\$285	\$330	\$378	\$450
	Of Counsel	1	8	\$440	\$408	\$428	\$495	\$525
	Equity Partner/Shareholder/Proprietor	5	106	\$597	\$450	\$573	\$860	\$1,345
Middle Atlantic	Non-equity Partner/Salaried Partner/Non-Participating Partner	4	193	\$737	\$455	\$625	\$1,075	\$1,155
	Associate Lawyer	6	182	\$569	\$325	\$560	\$785	\$925
	Staff Lawyer	2	20	\$547	\$445	\$495	\$653	\$753
	Of Counsel	3	30	\$833	\$600	\$860	\$1,155	\$1,155
	Equity Partner/Shareholder/Proprietor	5	99	\$664	\$400	\$500	\$1,000	\$1,160
South Atlantic	Non-equity Partner/Salaried Partner/Non-Participating Partner	9	152	\$851	\$538	\$950	\$1,050	\$1,220
	Associate Lawyer	6	149	\$563	\$385	\$560	\$715	\$845
	Staff Lawyer	3	14	\$438	\$385	\$473	\$525	\$595
	Of Counsel	5	52	\$811	\$548	\$820	\$1,000	\$1,000
	Equity Partner/Shareholder/Proprietor	3	53	\$911	\$840	\$990	\$1,690	\$1,150
East North Central	Non-equity Partner/Salaried Partner/Non-Participating Partner	4	102	\$827	\$740	\$810	\$1,000	\$1,150
	Associate Lawyer	3	134	\$581	\$500	\$605	\$715	\$780
	Staff Lawyer	1	45	\$406	\$290	\$455	\$475	\$475
	Of Counsel	1	31	\$820	\$740	\$750	\$900	\$1,150
	Equity Partner/Shareholder/Proprietor	1	6	\$563	\$525	\$550	\$600	\$650
West North Central	Non-equity Partner/Salaried Partner/Non-Participating Partner	1	12	\$501	\$463	\$488	\$550	\$575
	Associate Lawyer	1	12	\$366	\$330	\$375	\$395	\$400
	Of Counsel	1	4	\$394	\$338	\$388	\$450	\$475
	Equity Partner/Shareholder/Proprietor	1	6	\$1,074	\$975	\$1,025	\$1,160	\$1,280
	Non-equity Partner/Salaried Partner/Non-Participating Partner	1	33	\$930	\$880	\$910	\$1,050	\$1,110
West South Central	Associate Lawyer	1	48	\$674	\$585	\$653	\$778	\$875
	Staff Lawyer	1	16	\$440	\$395	\$395	\$498	\$520
	Of Counsel	1	12	\$808	\$813	\$820	\$910	\$910
	Equity Partner/Shareholder/Proprietor	2	8	\$727	\$580	\$625	\$883	\$1,090
	Non-equity Partner/Salaried Partner/Non-Participating Partner	2	27	\$580	\$525	\$550	\$850	\$990
Mountain	Associate Lawyer	2	35	\$507	\$385	\$435	\$640	\$780
	Of Counsel	3	13	\$645	\$475	\$575	\$810	\$850
	Equity Partner/Shareholder/Proprietor	2	81	\$800	\$735	\$780	\$810	\$885
	Non-equity Partner/Salaried Partner/Non-Participating Partner	2	70	\$883	\$700	\$833	\$1,000	\$1,220
	Associate Lawyer	2	146	\$573	\$450	\$550	\$690	\$800
Pacific	Of Counsel	2	10	\$806	\$685	\$755	\$950	\$1,100

BROAD REGION BY YEARS OF LEGAL EXPERIENCE
 STANDARD HOURLY BILLING RATES
 As of January 1, 2022

Broad Region/Years of Experience	Number of Offices	Number of Lawyers	Rate				
			Average	Lower Quartile	Median	Upper Quartile	Ninth Decile
Northeast	Under 2 years	5	14	\$485	\$255	\$548	\$680
	2 or 3 Years	5	33	\$448	\$310	\$340	\$665
	4 or 5 Years	6	29	\$456	\$260	\$390	\$640
	6 or 7 Years	6	35	\$490	\$300	\$360	\$715
	8 to 10 Years	5	58	\$568	\$340	\$513	\$800
	11 to 15 Years	7	94	\$700	\$420	\$708	\$910
	16 to 20 Years	6	84	\$656	\$425	\$520	\$863
	21 to 30 Years	6	118	\$708	\$450	\$545	\$900
	31 or More Years	6	128	\$721	\$510	\$625	\$760
							\$880
Midwest	Under 2 years	2	17	\$477	\$500	\$500	\$500
	2 or 3 Years	3	30	\$455	\$330	\$500	\$565
	4 or 5 Years	3	24	\$467	\$320	\$495	\$605
	6 or 7 Years	4	50	\$567	\$380	\$675	\$800
	8 to 10 Years	3	39	\$608	\$440	\$690	\$755
	11 to 15 Years	4	54	\$588	\$455	\$643	\$740
	16 to 20 Years	4	48	\$690	\$500	\$740	\$770
	21 to 30 Years	4	54	\$773	\$575	\$825	\$940
	31 or More Years	4	82	\$945	\$750	\$1,040	\$1,150
							\$1,150
South	Under 2 years	3	22	\$485	\$425	\$560	\$560
	2 or 3 Years	4	32	\$528	\$428	\$583	\$630
	4 or 5 Years	4	48	\$538	\$330	\$635	\$715
	6 or 7 Years	4	44	\$596	\$418	\$715	\$820
	8 to 10 Years	3	55	\$664	\$395	\$740	\$875
	11 to 15 Years	7	89	\$705	\$435	\$740	\$930
	16 to 20 Years	7	60	\$734	\$425	\$780	\$950
	21 to 30 Years	7	115	\$824	\$495	\$900	\$1,050
	31 or More Years	7	116	\$860	\$450	\$950	\$1,150
							\$1,280
West	Under 2 years	3	11	\$414	\$335	\$385	\$560
	2 or 3 Years	3	23	\$459	\$385	\$415	\$600
	4 or 5 Years	3	29	\$558	\$425	\$495	\$715
	6 or 7 Years	3	38	\$538	\$425	\$483	\$673
	8 to 10 Years	3	45	\$628	\$495	\$570	\$780
	11 to 15 Years	3	61	\$638	\$545	\$625	\$740
	16 to 20 Years	3	44	\$739	\$650	\$700	\$838
	21 to 30 Years	4	72	\$780	\$675	\$755	\$843
	31 or More Years	3	65	\$906	\$790	\$820	\$1,000
							\$1,220

NARROW REGION BY YEARS OF LEGAL EXPERIENCE
STANDARD HOURLY BILLING RATES
As of January 1, 2022

		Rate					
		Number of Offices	Number of Lawyers	Average	Lower Quartile	Median	Upper Quartile
New England	Under 2 years	2	2	\$243	\$230	\$243	\$255
	4 or 5 Years	3	6	\$316	\$265	\$295	\$390
	6 or 7 Years	3	5	\$353	\$310	\$360	\$400
	8 to 10 Years	2	7	\$340	\$320	\$340	\$365
	11 to 15 Years	4	11	\$411	\$335	\$380	\$475
	16 to 20 Years	3	6	\$457	\$415	\$463	\$500
	21 to 30 Years	4	16	\$527	\$458	\$495	\$620
	31 or More Years	3	16	\$534	\$500	\$533	\$625
	Under 2 years	4	12	\$526	\$420	\$578	\$680
	2 or 3 Years	5	33	\$448	\$310	\$340	\$665
Middle Atlantic	4 or 5 Years	5	23	\$493	\$260	\$480	\$715
	6 or 7 Years	4	30	\$513	\$300	\$373	\$750
	8 to 10 Years	4	51	\$599	\$360	\$555	\$925
	11 to 15 Years	5	83	\$738	\$440	\$785	\$1,010
	16 to 20 Years	5	78	\$682	\$435	\$543	\$1,020
	21 to 30 Years	4	102	\$736	\$450	\$565	\$1,005
	31 or More Years	5	112	\$748	\$510	\$625	\$925
	Under 2 years	3	17	\$468	\$385	\$560	\$560
	2 or 3 Years	4	23	\$501	\$405	\$535	\$630
	4 or 5 Years	4	39	\$516	\$300	\$525	\$715
South Atlantic	6 or 7 Years	4	33	\$569	\$300	\$675	\$820
	8 to 10 Years	3	40	\$639	\$350	\$713	\$875
	11 to 15 Years	7	59	\$688	\$395	\$740	\$950
	16 to 20 Years	7	47	\$722	\$425	\$740	\$950
	21 to 30 Years	7	99	\$808	\$470	\$850	\$1,000
	31 or More Years	7	103	\$837	\$435	\$940	\$1,150
	Under 2 years	3	17	\$468	\$385	\$560	\$560
	2 or 3 Years	4	23	\$501	\$405	\$535	\$630
	4 or 5 Years	4	39	\$516	\$300	\$525	\$715
	6 or 7 Years	4	33	\$569	\$300	\$675	\$820

East North Central	Under 2 years	1	15	\$498	\$500	\$500	\$500	\$500
	2 or 3 Years	2	28	\$465	\$380	\$500	\$565	\$565
	4 or 5 Years	2	23	\$472	\$320	\$495	\$605	\$640
	6 or 7 Years	3	45	\$588	\$455	\$675	\$715	\$800
	8 to 10 Years	2	36	\$624	\$455	\$715	\$755	\$780
	11 to 15 Years	3	50	\$600	\$455	\$683	\$740	\$810
	16 to 20 Years	4	44	\$713	\$525	\$740	\$790	\$1,000
	21 to 30 Years	4	44	\$828	\$785	\$900	\$940	\$1,000
	31 or More Years	3	79	\$960	\$810	\$1,040	\$1,150	\$1,150
	Under 2 years	1	2	\$315	\$315	\$315	\$315	\$315
West North Central	2 or 3 Years	1	2	\$330	\$330	\$330	\$330	\$330
	4 or 5 Years	1	5	\$379	\$375	\$390	\$390	\$415
	6 or 7 Years	1	3	\$417	\$375	\$400	\$475	\$475
	8 to 10 Years	1	4	\$444	\$413	\$450	\$475	\$475
	11 to 15 Years	1	4	\$444	\$388	\$463	\$500	\$500
	16 to 20 Years	1	4	\$531	\$500	\$538	\$575	\$580
	21 to 30 Years	1	10	\$567	\$450	\$600	\$650	\$650
	31 or More Years	1	3	\$567	\$450	\$600	\$650	\$650
	Under 2 years	1	5	\$541	\$560	\$560	\$560	\$600
	2 or 3 Years	1	9	\$596	\$600	\$630	\$630	\$630
West South Central	4 or 5 Years	1	9	\$633	\$675	\$675	\$715	\$715
	6 or 7 Years	1	11	\$678	\$500	\$755	\$800	\$800
	8 to 10 Years	1	15	\$729	\$585	\$820	\$875	\$910
	11 to 15 Years	1	30	\$738	\$620	\$820	\$910	\$910
	16 to 20 Years	1	13	\$774	\$510	\$910	\$910	\$1,050
	21 to 30 Years	1	16	\$924	\$910	\$975	\$1,050	\$1,110
	31 or More Years	1	13	\$1,040	\$895	\$1,050	\$1,160	\$1,280
	Under 2 years	1	3	\$315	\$305	\$335	\$335	\$335
	2 or 3 Years	2	5	\$433	\$335	\$340	\$565	\$605
	4 or 5 Years	2	4	\$511	\$383	\$515	\$640	\$640
Mountain	6 or 7 Years	2	7	\$448	\$400	\$425	\$455	\$475
	8 to 10 Years	3	12	\$588	\$443	\$515	\$768	\$780
	11 to 15 Years	2	16	\$588	\$475	\$535	\$755	\$835
	16 to 20 Years	2	10	\$668	\$550	\$563	\$850	\$945
	21 to 30 Years	3	16	\$619	\$500	\$563	\$625	\$990
	31 or More Years	2	10	\$900	\$725	\$900	\$1,040	\$1,215
	Under 2 years	2	8	\$451	\$385	\$385	\$560	\$560
	2 or 3 Years	2	18	\$466	\$385	\$420	\$600	\$630
	4 or 5 Years	2	25	\$565	\$425	\$495	\$715	\$755
	6 or 7 Years	2	31	\$559	\$450	\$495	\$755	\$800
Pacific	8 to 10 Years	2	33	\$643	\$495	\$575	\$820	\$875
	11 to 15 Years	2	45	\$655	\$585	\$630	\$740	\$820
	16 to 20 Years	2	34	\$761	\$670	\$700	\$825	\$985
	21 to 30 Years	2	56	\$826	\$723	\$778	\$860	\$1,100
	31 or More Years	2	55	\$907	\$790	\$820	\$970	\$1,220



EXHIBIT C



National Association of Legal Fee Analysis

Specializing in Attorney Fees & Legal Billing

The Nation's Top Attorney Fee Experts

The 2023 Litigation Hourly Rate Survey & Report

NALFA's Annual Survey of Prevailing Market Rates
in Civil Litigation in the U.S.

Published & Released on December 27, 2023

NALFA

NALFA is a 501(c)(6) non-profit professional association for the legal fee analysis field. Our members provide a range of services on attorney fee and legal billing matters. We serve as the organizing and governing body for the legal fee analysis profession.

Courts and clients turn to us for expertise when attorney fees and expenses are at issue in large, complex cases. NALFA members are fully qualified attorney fee experts, special masters, bankruptcy fee examiners, fee dispute neutrals, and legal bill auditors. All our members follow Best Practices in Outside Legal Fee Analysis.

About NALFA

The National Association of Legal Fee Analysis (NALFA) is federal tax-exempt group organized and governed under 26 U.S.C. § 501(c)(6). We serve as the professional governing body for the legal fee analysis profession. As a 501(c)(6) organization, NALFA devotes itself to advancing the lines of business and representing the professional interests of the legal fee analysis profession.

Our mission is to help ensure quality and reliability across the legal fee analysis profession, regardless of membership status. Our standard for analysis and evaluating attorney fees and expenses is reasonableness. Our members observe proven methodologies and adhere to the proper standard of reasonableness when reviewing outside attorney fees and expenses. Our members follow Best Practices in Outside Legal Fee Analysis.

NALFA has been cited or quoted by 21 different media outlets and/or publication: The Wall Street Journal, Bloomberg News, ALM's American Lawyer, The Chicago Tribune, Bloomberg BNA, CNBC, Thomson Reuters, Insurance Journal, Minneapolis-St. Paul Business Journal, Daily Journal, ALM's Daily Business Review, ALM's National Law Journal, FindLaw.com, The Florida Bar Journal, Law 360, Politico, ALM's Law.com, Missouri Lawyers Media, ALM's Critical Mass, Portland Business Journal, and Detroit Free Press.

NALFA is an approved 501(c)(6) federal tax-exempt organization under the IRS Code.

NALFA is an A.M. Best Recommended Expert Service Provider (2008-Present).

NALFA has recommended qualified attorney fee experts on legal fee and billing matters ranging from \$42,000-\$500 million.

Since 2008, NALFA has hosted over 45 different CLE and professional development programs on attorney fees and legal billing topics. Our CLE faculty has included 23 sitting federal judges.

Every year, NALFA announces, "The Nation's Top Attorney Fee Experts".

Every year, NALFA conducts an hourly rate survey of civil litigation in the U.S. This is the nation's largest and most comprehensive survey or study of hourly billing rates in litigation.

NALFA offers a Certificate in Ethical Billing & Reasonable Fees, the nation's first and only certificate of its kind for registered guests of multiple CLE programs.

NALFA has established Best Practices in Outside Legal Fee Analysis, a peer-review driven code of professional conduct for professionals who routinely perform outside legal fee analysis.

NALFA's News Blog covers jurisprudence and scholarship on reasonable attorney fees throughout the U.S.

NALFA filed Amicus Briefs in *Worley v. Storage USA*, *Pipefitters v. Oakley* in California appellate courts and in the landmark ADA case, *Covington v. McNeese State University* in the Louisiana Supreme Court.

NALFA has been cited or quoted by 21 different media outlets and/or publications: The Wall Street Journal, Bloomberg News, ALM's American Lawyer, The Chicago Tribune, Bloomberg BNA, CNBC, Thomson Reuters, Insurance Journal, Minneapolis-St. Paul Business Journal, Daily Journal, ALM's Daily Business Review, ALM's National Law Journal, FindLaw.com, The Florida Bar Journal, Law 360, Politico, ALM's Law.com, Missouri Lawyers Media, ALM's Critical Mass, and Portland Business Journal, and Detroit Free Press.

NALFA houses a body of scholarship on reasonable attorney fees including surveys, reports, articles, and studies. NALFA also recognizes the nation's most influential scholarship on attorney fees.

NALFA conducts custom design hourly rate surveys for law firms, corporate legal departments, and government agencies. A federal judge cited a NALFA hourly rate survey in his attorney fee award in the *Vortens* class settlement.

The Ethics of Reviewing Outside Legal Fees: Dedicated to the Legacy of Founding Member Bruce R. Meckler (1955-2016)

Legal fee analysis is the comprehensive review and analysis of attorney fees and costs by an outside party in a legal matter. Professionals who routinely perform outside or third-party legal fee analysis include attorney fee experts, special fee masters, bankruptcy fee examiners, fee dispute neutrals, and legal bill reviewers.

The following ten best practices measures were developed over several years with input and consensus from thought leaders (members and non-members) from across the legal fee analysis professional community. These best practice measures promote values such as ethics, independence, and professional development. These peer review driven standards help strengthen the legal fee analysis field by ensuring integrity in the process and reliability in the results. These best practice measures fulfill the "generally accepted" standards within a professional community as required by *Daubert* and are widely considered the mainstream of outside legal fee analysis.

All our members (i.e. fully qualified attorney fee experts, special masters, bankruptcy fee examiners, fee dispute neutrals, and legal bill reviewers) are signatories to the following ethics for reviewing outside legal fees:

- 1.00 Adhere to the proper standard of reasonableness.**
- 2.00 Observe a consistent and reliable methodology.**
- 3.00 Keep updated on the latest jurisprudence (i.e. the body of law, key court rulings, expert fee reports, etc.) on reasonable attorney fees and expenses.**
- 4.00 Keep updated on the latest scholarship (i.e. empirical papers, studies, surveys, reports, etc.) on reasonable attorney fees and expenses.**
- 5.00 Participate in professional development and CLE programs on litigation management, attorney fees, and legal billing topics.**
- 6.00 Do not advertise false or intentionally misleading information or offer any guarantee of outcome.**
- 7.00 Do not charge on a contingency basis (i.e. based on the results obtained).**
- 8.00 Do not accept a case or client where there is an inherent conflict of interest.**
- 9.00 Keep all fee, billing, rate, and work product information in strict confidence.**
- 10.00 Employ data science and technology.**

NALFA's Thought Leaders & Program Partners on Ethical Legal Billing & Reasonable Attorney Fees:

O'CONNOR
AND ASSOCIATES

Special Counsel Services

www.joclaw.com



Acknowledgements (Individuals)

Before conducting this hourly rate survey, NALFA consulted with several subject matter experts. They helped guide this survey from its inception to its completion. Our members and other professionals helped advise on survey format, survey design, survey questions, and other data science issues.

NALFA would like to thank several people within our membership network (i.e. members, faculty, and fellows). Our members are the leaders of the outside legal fee analysis field. Specifically, we would like to thank all our current 2023 members including:

John D. O'Connor, Principal, O'Connor & Associates (San Francisco, CA)

Andre E. Jardini, Partner, KPC Legal Audit Services Inc. (Glendale, CA)

Elise S. Frejka, Principal, Frejka PLLC (New York, NY)

Daniel M. White, Partner, White & Amundson APC (San Diego, CA)

Robert L. Kaufman, Partner, Woodruff Spradlin & Smart (Costa Mesa, CA)

Jacqueline S. Vinaccia, Partner, Vanst Law LLP (San Diego, CA)

Fred M. Blum, Partner, Edlin Gallagher Huie & Blum (San Francisco, CA)

NALFA would also like to thank several professors and graduate assistants of Mathematics and Statistics Department at Loyola University Chicago, Northwestern University, and the NORC at the University of Chicago who consulted and advise on some of the data science behind this survey.

Acknowledgements (Books & Other Material)

In addition to consulting with individuals, NALFA studied several books on surveys, statistics, data science, data management, and data presentation. We recommended the following books to consumers of this hourly rate survey:

Wheelan, Charles. *Naked Statistics*. W.W. Norton & Company, 2014

Cady, Field. *The Data Science Handbook*. Wiley, 2017

Zumel, Nina and Mount, John. *Practical Data Science with R (Second Edition)*. Manning, 2020

Berinato, Scott. *Good Charts*. Harvard Business Review Press, 2016

Wickham, Hadley and Gromelund. *R for Data Science*. O'Reilly, 2017

Bruce, Peter, Bruce, Andrew and Gedeck, Peter. *Practical Statistics for Data Scientists (Second Edition)*. O'Reilly, 2020

Foreman, John. *Data Smart*. Wiley, 2014

Knafllic, Cole Nussbaumer. *Storytelling with Data*. Wiley, 2015

The Economist. *Numbers Guide (Sixth Edition)*. Perseus, 2014

EMC Education Services. *Data Science and Big Data Analytics*. Wiley, 2015

Borman, David. *Statistics 101*. Simon & Schuster, 2018

De Veaux, Richard and Velleman, Paul. *Intro Stats*. Pearson, 2004

Bluman, Allan G. *Elementary Statistics (Eighth Edition)*. McGraw Hill, 2009

NALFA would also like to acknowledge other material including *Evaluating Survey Questions: An Inventory of Methods* by the Subcommittee of Questionnaire Evaluation Methods of Statistical and Science Policy in the U.S. Office of Management and Budget (January 2016) and *Evaluating Survey Questions* by Doctor Chase H. Harris of Harvard University's Program on Survey Research, and *Methods for Testing and Evaluating Survey Questions* by Stanley Presser et al., *Public Opinion Quarterly* Vol. 68, Issue 1 (March 2004). We'd also like to acknowledge two PBS Nova programs, "The Great Math Mystery" (Season 47, Episode 7) and "Prediction by the Numbers" (Season 45, Episode 5) that helped ground this survey into a mathematical and statistical framework.

Dedication

NALFA would like to dedicate this fourth annual hourly rate survey to one of our original, founding members, Robert Kaufman. Robert Kaufman is one of the nation's top attorney fee experts. He has been a long-time NALFA member. Mr. Kaufman is highly experienced at analyzing fees and billing entries in attorney fee requests.

NALFA Conducts Custom Hourly Rate Surveys

Hourly rates are not attorney fees. They are, however, the engine that drive attorney fees. Hourly rates are one of the most important factors in calculating lodestar attorney fee awards. As such, establishing the prevailing market hourly rate is paramount for any claim of reasonable attorney fees. But one attorney's individual billing rate (i.e. a single discrete numerical value) is not the same as the prevailing market rate (i.e. an aggregated numerical range or an approximate average).

NALFA conducts custom hourly rate surveys for law firms and corporate legal departments. Our hourly rate surveys provide clients with accurate and authoritative data on prevailing market rates within a given geography market and / or practices area(s). Over the last several years, we have developed the digital infrastructure to perform hourly rate surveys of any size and scope. Indeed, our custom hourly rate surveys have been cited by litigators in court documents and referenced by court adjuncts in court and ADR proceedings. One of our surveys was cited by a federal judge in his attorney fee award. Our surveys can also be used for internal purposes, such as rate comparisons.

NALFA Custom Surveys Engagements

NALFA has been hired to conduct several custom hourly rate surveys for private clients. Some of our recent custom hourly rate survey engagements include:

A boutique law firm in Boston engaged NALFA to conduct a survey of associate and partner level billing rates in litigation in the greater Boston area.

A large Miami law firm hired NALFA to conduct a survey of plaintiffs' and defense rates in commercial litigation in South Florida.

A small plaintiffs' law firm in Dallas engaged NALFA to conduct a survey and report of hourly rates in consumer class actions in the Dallas-Fort Worth area. This survey was cited by a federal judge in his attorney fee award.

An insurer hired NALFA to conduct a survey of billing rates of defense counsel in insurance coverage litigation throughout California.

A large law firm in Seattle engaged NALFA to conduct a survey of hourly billing rates in regular and complex litigation in the U.S. District Court for the Western District of Washington jurisdiction.

A small law office in Albany hired NALFA to conduct a national survey of billing rates in public interest and civil rights litigation in federal court.

A technology firm engaged NALFA to conduct a survey of hourly rates in large and mid-size law firms in patent litigation in the San Francisco and Silicon Valley region.

A defense law firm with offices throughout North Carolina hired NALFA to conduct an hourly rate survey of similarly sized law firms in the Charlotte area so they could compare billing rates with their litigation peers.

A government agency engaged NALFA to conduct a survey of hourly rates in large Chapter 11 bankruptcy cases, nationwide.

A mid-size law firm in Atlanta hired NALFA to conduct a survey of hourly rates in IP litigation in several major markets.

Federal Judge Cities NALFA Survey in Attorney Fee Award

A federal judge has cited a NALFA survey in a class action attorney fee award. U.S. District Judge Amos L. Mazzant of the U.S. District Court for the Eastern District of Texas referenced NALFA's hourly rate survey in awarding attorney fees and expenses in *Cone v. Porcelana Corona de Mexico, S.A.de C.V. et al.* ("Vortens"). The NALFA survey independently showed prevailing market rate data of class counsel in the Dallas-Fort Worth area.

"To support its submitted rates, Class Counsel commissioned and submitted a survey conducted by the National Association of Legal Fee Analysis ("NALFA"). The sample of the NALFA survey was Dallas-Fort Worth metropolitan area plaintiffs' counsel practicing in consumer related or product liability class-action work. Class Counsel's submitted hourly rates, while on the higher side, falls within the accepted range," wrote Judge Mazzant.

NALFA conducts custom hourly rates for clients such as law firms to independently prove billing rates in court. Lead plaintiffs' counsel commissioned NALFA to conduct a billing rate survey of plaintiffs' rates in class actions in the Dallas-Fort Worth area. NALFA conducted this survey via email, employing its best practices measures. In his 26-page fee order, Judge Mazzant accepted the hourly rate data and survey results and awarded over \$4.3 million in attorney fees in the *Vortens* class settlement.

NALFA's Four Hourly Rate Factors

NALFA has identified four factors that help determine prevailing market rates. These variables include, but are not limited to:

- 1. City / Geography / Jurisdiction (i.e. Oklahoma City vs. New York City Rates)**
- 2. Years of Litigation Experience / Seniority (i.e. 3rd Year Associate vs. 14th Year Partner Rates)**
- 3. Practice Area / Complexity of Case (i.e. PI Litigation vs. IP Litigation Rates)**
- 4. Law Firm / Law Office Size (i.e. Solo Law Office vs. 400+ Attorney Law Firm Rates)**

These four hourly rate factors correlate directly to hourly rates. These factors are known as the primary factors and should be a part of any hourly rate survey.

Each custom survey is designed to meet the needs of the client. We work closely with the client on all aspects of the hourly rate survey and the data. We charge a flat fee for this services and the cost depends on the size and scope of the survey. All client information is kept in strict confidence.

Survey Process & Methodology

Our hourly rate surveys are conducted via electronic mail (e-mail). Generally, our hourly rate surveys pass through the following stages:

Identifying Survey Population

Survey Design & Format / Survey Questions

Launch Survey Campaign

Monitor Survey Progress

Achieve Representative Sample Size

Tabulate Survey Results & Report Findings

The client has the ultimate authority over the survey questions and survey design. Good survey design leads to good data. NALFA begins the survey process by accumulating a survey population of attorneys. This is done through proprietary methods. Once we have a large enough population size, the email survey can begin. The email survey is conducted over several weeks or perhaps months. We keep the client updated of the surveys' progress. In order to increase survey participation, we can offer the survey participants certain benefits for participation, such as receiving the survey data or portions of the survey data. We can also offer other benefits such as discounts on our CLE programs and free on-demand CLE programs. Once we have reached a certain threshold, we conclude the survey and begin tabulating the results.

Work Product: Survey Results & Report

At the conclusion of the survey, NALFA will prepare the survey data and report. The survey results will include the raw data of the survey. The survey report includes a detailed narrative of the survey process and methodology. Throughout the entire survey process, NALFA respects the privacy of survey participants and will never disclose the names of individuals or law firms.

Word Cloud

The following words, terms, and phrases are all categories from our news blog



Introduction

Since 2020, NALFA has conducted an annual hourly rate survey of civil litigation in the U.S. This survey shows billing rate data on the very factors that correlate to hourly rates in litigation:

City / Geography

Years of Litigation Experience / Seniority

Position / Title

Practice Area / Complexity of Case

Law Firm / Law Office Size

This empirical survey and report provides micro and macro data of current hourly rate ranges for both defense and plaintiffs' litigators, at various litigation experience levels, from large law firms to solo shops, in routine and complex litigation, and in the nation's largest markets. This data-intensive survey contains hundreds of data sets and thousands of data points covering all relevant hourly rate categories and variables. This is the nation's largest and most comprehensive survey or study on hourly billing rates in litigation.

This is the fourth straight year in a row that NALFA has conducted this survey on billing rates. The 2023 Litigation Hourly Rate Survey & Report contains new factors and variables. Over 24,800 qualified litigators fully participated in this hourly rate survey. The data-rich survey was designed by our attorney fee experts to aid litigators in proving their lodestar rates in court and comparing their rates to their litigation peers.

Importance of Hourly Billing

Hourly billing is the nation's oldest, most popular, and still most common form of charging for legal services in litigation. Hourly billing penetrates all attorneys in the legal profession – criminal, civil, government, and in-house. Every practicing attorney in the U.S. has some level of interest in current hourly billing rates.

Indeed, hourly rates may be the most important economic factor in the practice of law. Hundreds of courts (state and federal) from across the U.S. use the lodestar method to calculate attorney fee awards. Hourly rates comprise one-half of the lodestar equation.

Law Can't Quit Hourly Billing

Hourly rates may be the most important economic factor in the practice of law.

Hourly rates permeate almost all attorneys in the legal profession:

Civil (Litigation & Transactional)

Criminal (Defense)

In-House Counsel (see Massachusetts case *Holland v. Jachmann*, 2014)

Government (In order to attract attorneys, governmental salaries must keep pace with private sector rates)

Hourly rates are the most common form of legal billing.

Hourly rates pre-date the U.S. legal system (*Marbury v. Madison*).

Hourly rates are half of the lodestar equation.

Hourly rate data will always be compared to AFA (Alternative Fee Agreements). Good hourly rate data can assist law firms and clients in AFAs.

Even judges who award fees, in contingency fee cases, want to see a lodestar (hourly rate x total hours billed) "crosscheck".

Hourly Rate Terms

Hourly rates are not attorney fees. But hourly rates help determine attorney fees. There is a difference between rates charged or billed and rates actually paid. Here are some other basic rate terms used in hourly billing:

Premium Rates – Rates paid at the high end of the distribution curve (Tier 4).

Discount Rates – Rates charged below market value at the low end of the distribution curve (Tier 1).

Unitary Rates – A discounted rate charged by a group of litigators.

Quoted Rate -- Agreed upon hourly rate by the attorney and client in a fee agreement.

Client Rate -- Based on a single hourly charge for the client, regardless of which attorney works on the case and what he or she does on the case.

Activity Rate -- Based on hourly rates that vary depending on the type of service or activity performed and the degree of difficulty of the activity. Sometimes call task-based rate.

Blended Rate -- Single hourly rate set by taking into account the mix of attorneys working on the matter.

Other Hourly Rate Surveys

This is not the only hourly rate survey. Other companies and organizations have produced similar surveys of their own. These companies include e-billing vendors, media companies, and other private enterprises. Organizations that have produced hourly rate surveys include the American Intellectual Property Law Association (AIPLA) and state and local bar associations. Some of these surveys are public and others are private. Before undertaking this survey project, NALFA studied several of these surveys, studies, and reports. We cover these types of surveys in our news blog and are eager to promulgate good hourly rate data analytics.

But some of these surveys conflate hourly rates and compensation or salary (more on that on the next slide). Some of these hourly rate surveys never disclose basic survey criteria, like survey methodology, sample size, and response or participation rates. Still many other rate surveys and studies are big on conclusions and findings, but short on how those results were obtained or calculated. In short, some of these other billing rate surveys seem ad hoc, inconsistent, and somewhat transient.

This survey is different. We value disclosure, consistency, and clarity in our surveys. We want the consumers of this hourly rate survey to understand the methodology and mathematics behind it. What is more, we have confidence in our data. It is not 'dark data', obtained illicitly. The results were given voluntarily, by verified and qualified litigators, incentivized by receiving the full survey results themselves. As you will observe, we offer no value judgments, opinions, or commentary on litigation rates. We let the data speak for itself.

Hourly Rate Data vs. Compensation Data

As previously mentioned, hourly rates and compensation are two different values or variables. This is a survey on hourly billing rates. This is not a survey on attorney compensation. Compensation has to do with salary, bonuses, benefits, perks, etc. This is a survey on what litigators bill, not what they earn. While there may be a strong correlation between compensation and rates, we don't explore that in this survey.

We found that litigators are more willing to share data on their hourly rates than their salaries. They view the former as having a public component and the latter as purely private. Most litigators don't treat their hourly rates like they are sensitive trade secrets. Hourly rates are disclosed frequently by litigators to parties in attorney fee agreements, attorney fee dispute matters, and attorney fee requests. They know that their rates (usually) must be disclosed in order to receive a lodestar calculated attorney fee award. In fact, billing rates are often discoverable in large, complex attorney fee dispute cases in court and ADR.

Hourly rate data is not unknowable. As such, our survey is premised on this simple concept: If you want to know the hourly rates of litigators, ask them.

Regular vs. Complex Litigation

Civil litigation houses a host of practice areas. These practice areas range from the simple dog bite case (i.e. personal injury) to the complex price fixing case (i.e. antitrust). Law firms or offices can practice in dozens of areas of litigation or just one.

This survey is not practice area specific. Instead, we ask litigators to distinguish between regular and complex litigation. Of course, how complex litigation may be is in the eye of the beholder, especially to a young associate. But we leave it up to the professional judgment of the litigator to draw that distinction. While not all cases fall neatly into these two categories, most qualified litigators can discern between regular and complex litigation.

For our purposes, complex litigation refers to individual cases or entire practice areas that are highly technical, medical, or financial. We also consider high-stakes or bet-the-company litigation to fall within the complex realm. By contrast, regular litigation are individual cases or entire practice areas that are more routine, run-of-the-mill, straightforward, or garden variety. These cases and practice areas tend to be less technical and have less at stake or issue.

Litigation Practice Areas

This is an hourly rate survey of litigation rates, that is hourly rates in regular litigation and hourly rates in complex litigation. As such, it is not practice area specific. While there may be a range of litigation practice areas that this survey covers, there are some it does not.

Indeed, there are some very specific areas of law with their own special rate economics. Some practice areas maintain their own rate economics governed by case law, market conditions, and other unique factors. Our hourly rate scale and tier rate system would not apply to these practice areas because they tend to be on the very low end of the scale or the very high end of the scale.

Some of these practice areas include, insurance coverage litigation, large Chapter 11 bankruptcies, workers comp cases, and others. For these practice areas and perhaps other niche practice areas, this survey data may not be a useful.

Important Case Law on Hourly Rates

The following are just a small sample of important federal case law on hourly rates:

Blum v. Stenson, 465 U.S. 886 (1984) 104 S. Ct. 1541

Laffey v. Northwest Airlines Inc., 746 F.2d 4 (D.C. Cir. 1984)

Nelson Perez-Sosa v. Marrick Garland, 22 F.4th 312 (1st Cir. 2022)

Goldberg v. Integrated Resources Inc., 209 F.3d 43 (2nd Cir. 2000)

In re Rite Aid Corp Securities Litigation, 396 F.3d 294 (3rd Cir. 2005)

Student Pub. Interest Research Group of N.J. v. AT&T Bell Labs., 842 F.2d 1436, 1446 (3rd Cir. 1988)

League of United Latin Amer. Citiz. #4552 v. Roscoe Indep. School Dist. 119 F.3d 1228 (5th Cir. 1997)

Gonter v. Hunt Valve, 510 F.3d 610 (6th Cir. 2007)

Norcross v. Board of Education, 611 F.2d 624 (6th Cir. 1979)

Pickett v. Sheridan Health Care Ctr., 664 F.3d 632 (7th Cir. 2011)

Harper v. City of Chicago Heights, 223 F.3d 593, 604 (7th Cir. 2000)

People Who Care v. Rockford Bd. Of Educ., Sch. Dist. No. 205. 90 F.3d 1307, 1311-13 (7th Cir. 1996)

Pinkham v. Camex Inc., 84 F.3d 292 (8th Cir. 1996)

In re Manoa Finance Co. Inc., 853 F.2d 687 (9th Cir. 1988)

Mayson v. Pierce, 806 F.2d 1556 (11th Cir. 1987)

Christensen v. Stevedore Services of America, No. 03-0302, 2010 WL 2256182 (Ben. Rev. Bd. May 13, 2010)

Don Aguilar v. Zep Inc., Case No. 13-cv-00563-WHO (N.D. Cal. Aug. 15, 2014)

Demarco Nichols v. Ill. Dept. of Transp., No. 12-cv-1789 (N.D. Ill. Jan. 10, 2019)

Courthouse News Serv. v. George Schaefer, 484 F. Supp. 3d 273 (E.D. Va. 2020)

The Jurisprudence of Hourly Rates

The jurisprudence of hourly rates can be seen in statutes and case law. There are a couple reoccurring phrases that come up time and again in case law:

- **Rates in the...“Relevant Community”**
- **“Prevailing Market Rate(s)”**
- **Rates... “in the community for similar services by lawyers of comparable skill, experience, and reputation.”**

Attorney Fee Award Rate Data vs. Prevailing Market Rate Data

Hourly rate data does not solely come from surveys. Using the lodestar calculation method, everyday across the U.S., state and federal courts award rates in certain litigation. These court awarded rates are determined by judges. Some judges rely on hourly rates awarded from prior, similar cases. Who better to award litigation rates than the tier of fact, with close-proximity to the lawyering of plaintiffs and defense counsel? Indeed, judges can see the skills, talent, and experience of the litigators up close in court proceedings and court filings. While rate data from fee awards may be useful, it is not market based.

Courts *alone* should not be allowed to define 'prevailing market rates' in such a way as to define the 'market' only in terms of what has been awarded. As stated in *Christensen*, "Courts that try to establish...[litigation] rates by looking to the going rate for...[litigation] work therefore do not examine an independently operating market governed by supply and demand, but rather recast fee awards made by previous courts into 'market' rates. Courts adopting the micro-market approach, therefore, engage in a tautological, self-referential enterprise." The market should set prevailing market rates, not courts themselves.

The data in this survey is prevailing market rates. Our data is market based. The data here was provided by a range of private sector litigators working in the open market. Sitting on the bench, judges are in a position to evaluate the skills, talent, and experience of the litigators before them. However, that same bench is far from the open market economy. Our surveys can change that. This survey and its data on prevailing market rates gives the judiciary access to real-world rates.

Survey Best Practices

Effective surveys start with best practices. In order to make this a productive hourly rate survey, NALFA consulted with several resources for survey best practices, including the Pew Research Center's "Writing Survey Questions" whitepaper. While all survey questionnaires are different and used to gather different data, we followed these survey principles:

Keep it Short, Simple, Direct & Neutral

Make Every Question Count

Speak in the Respondents Language

Ask Basic Questions First

Ask Personal Questions Last

Use a Survey Incentive

Survey Purpose

In this information age, data or analytics is decision making. From investments to sports, data-based analytics has transformed our economy and permeated all aspects of our society. Indeed, data is power. With good, actionable data, you can increase your market share or advantage and gain insight and understanding. Data analytics is essential to the practice of law. With new position titles like price analyst, data specialist, and practice analytics, law firms recognize the need for metric-based decision making.

This survey is the tool or method to obtain hourly rate data. In litigation, data can be used as evidence in court or ADR. Our billing rate data is grounded in mathematics and statistics. The purpose of this survey is to provide the most current, accurate, and reliable hourly rate data of civil litigation in the U.S. From our meta-data, you can understand the economics of hourly rates in litigation and with more targeted or focused data, you can make direct comparisons of defense and plaintiff rates among litigators with less than 10 years of litigation experience. Litigators can use this hourly rate data for two general purposes:

- 1. Internal – Compare Your Hourly Rate to Your Litigation Peers**
- 2. External – Cite as Evidence to Support or Challenge Hourly Rates in Court / ADR**

Stats 101

You don't need to be a statistician or data professional to read a chart or graph. But a little brush up on statistics might be helpful, especially if you're doing a deep dive on hourly rate data. For this hourly rate survey, it's important to know the following terms:

Mean – The average value

Median – The center value

Mode – The most frequent value

Bell Curve - The shape of a graph depicting the normal distribution of data

Quantitative – Refers to numerical-based data / values

Qualitative – Refers to word based (non-numerical) based data / values

Variance / Variation – The difference or gap between two data points or values

Chi-Squared Distribution – Is a family of asymmetrical distribution or spread of data

Survey Privacy & Work Product Statement

Individual hourly rate data is sensitive and must be protected. No individual names or law firm names appear in this survey and report. NALFA protects the privacy of all survey participants. We keep all individual litigator survey responses in strict confidence. No person or entity other than NALFA has access to the confidential individual responses.

But this survey, report, and the accompanying hourly rate data is all the proprietary work of NALFA. Consumers of this survey are free to cite and distribute survey totals, results, and hourly rate data as you see fit. In fact, we anticipate that our hourly rate data will be used by fee-seeking and fee-challenging litigators in court and ADR proceedings. All we ask of recipients of this survey, is not to post this survey and report online.

Famous Quotes on Data

The following are quotes on the importance of data:

“It is a capital mistake to theorize before one has data.” (Conan Doyle)

“Without big data analytics, companies are blind and deaf, wandering out onto the web like deer on the freeway.” (Geoffrey Moore)

“Errors using inadequate data are much less than those using no data at all.” (Charles Babbage)

“The core advantage of data is that it tells you something about the world that you didn’t know before.” (Hilary Mason)

“Data really powers everything we do.” (Jeff Weiner)

“We are entering a new world in which data may be more important than software.” (Tim O'Reilly)

“Passion provides purpose, but data drives decisions.” (Andy Dunn)

“Data is the most valuable asset in the world.” (Brittany Kaiser)

“Data is what distinguishes the dilettante from the artist.” (George V. Higgins)

“Good policy is grounded in a robust set of facts and data.” (Seth Moulton)

“Numbers Rule the Universe.” (Pythagoras)

Data Sets / Data Fields

We have organized the hourly rate data into different data sets. They include:

Primary Hourly Rate Variables (First Degree Data)

- Hourly Rates of All Litigators (Both Defense & Plaintiffs)
- Hourly Rates of Defense Litigators
- Hourly Rates of Plaintiffs' Litigators
- Hourly Rates in Regular Litigation
- Hourly Rates in Complex Litigation

Secondary Hourly Rate Variables (Second Degree Data)

- Hourly Rates by City / Geography
- Hourly Rates by Years of Litigation Experience / Seniority
- Hourly Rates by Law Firm / Law Office Size
- Hourly Rates by Position / Title

Other Hourly Rate Variables (Third Degree Data)

- Hourly Rates by Tier System
- Hourly Rates by Career Span of Litigator
- Most Important Factors Determining Hourly Rates
- Frequency of Hourly Rate Increases

Survey Symbol Key

To understand our charts and graphs, it's important to know the symbols we use and what they mean:

= Number of Responses

% = Percentage / Ratio of Responses

Survey Questions

This hourly rate survey asked 10 key questions. Each question required a single response. After consulting with survey design experts, we purposely kept the survey short to increase the participation and response rate. Each question served to gather key quantitative (non-numerical) and qualitative (numerical) hourly rate data. The survey questions were carefully sequenced, written in the first-person, and worded in the natural language used in the litigation sector:

1. I am an active, full-time ($\geq 50\%$ of practice devoted to litigation) civil litigator:

Yes

No

2. In my litigation practice (i.e. civil, tort, commercial, etc.), I mostly represent:

Defense

Plaintiffs

3. As a litigator, I work in a:

Solo Law Office (1 Atty)

Law Office (2-11 Attys)

Small Law Firm (12-49 Attys)

Mid-Size Law Firm (50-99 Attys)

Large Law Firm (100+ Attys)

4. My position / role in my litigation practice is best described as:

Associate

Senior Associate

Partner

Senior / Managing Partner

5. I've been continuously practicing litigation for:

Less than 2 Years

2-3 Years

4-5 Years

6-7 Years

8-9 Years

10-11 Years

12-13 Years

14-15 Years

16-17 Years

18-19 Years

20-22 Years

23-25 Years

26-28 Years

29-31 Years

32-34 Years

35-37 Years

38-40 Years

41-43 Years

44-46 Years

47+ Years

6. I practice litigation in:

Washington, DC

San Francisco, CA

New York, NY

Dallas, TX

Boston, MA

Los Angeles, CA

Chicago, IL

Houston, TX

Miami, FL

Philadelphia, PA

Atlanta, GA

San Diego, CA

Seattle, WA

Pittsburgh, PA

Tampa, FL

Cleveland, OH

Charlotte, NC

Minneapolis, MN

Austin, TX

Nashville, TN

Denver, CO

Phoenix, AZ

Las Vegas, NV

New Orleans, LA

Another U.S. City

7. My current, regular hourly rate for regular / routine litigation cases falls within:

- \$250 or Less
- \$251-\$300
- \$301-\$350
- \$351-\$400
- \$401-\$450
- \$451-\$500
- \$501-\$550
- \$551-\$600
- \$601-\$650
- \$651-\$700
- \$701-\$750
- \$751-\$800
- \$801-\$850
- \$851-\$900
- \$901-\$950
- \$951-\$1000
- \$1001-\$1100
- \$1101-\$1200
- \$1201-\$1300
- Over \$1300

8. My current, regular hourly rate for complex litigation cases falls within:

\$250 or Less

\$251-\$300

\$301-\$350

\$351-\$400

\$401-\$450

\$451-\$500

\$501-\$550

\$551-\$600

\$601-\$650

\$651-\$700

\$701-\$750

\$751-\$800

\$801-\$850

\$851-\$900

\$901-\$950

\$951-\$1000

\$1001-\$1100

\$1101-\$1200

\$1201-\$1300

Over \$1300

9. As a litigator, the factor that determines my hourly rate the most is:

- Location / Geography
- Years of Experience / Seniority
- Practice Area / Complexity of Case
- Economics / Relationship with Client
- Size of Law Firm / Office

10. On average, I raise my hourly rate:

- Every Year
- Every 2 Years
- Every 3 Years
- Every 4 Years
- Every 5 Years

What's New in 2023 Survey?

Hourly rates can change from year to year. Like many economic variables, billing rates are not static. As such, this survey is performed on a consistent and annual basis. But every year we seek to fine tune our questions to capture new and more accurate billing rate data. From survey design to data presentation, we work to enhance hourly rate data intelligence. Overall, we've added more variables or categories to our survey questions. In 2023, survey question changes include:

- In question one, we included the term “active, full-time ($\geq 50\%$ of practice devoted to litigation)”. (see slide 42)
- In question three, we deleted the option “non-profit organization” from the section.
- In question four, we added “Senior Associate” as one of the section choice. Here, we expanded 3 choices to 4 choices.
- In question five, we added several more “years of experience” choices. Here, we expanded 15 choices to 20 choices. (see slide 43)
- In questions seven and eight, we changed the hourly rate scale. (see slide 44)

I am “an active, full-time” litigator

Our first survey question is a qualifying one. We want to make sure the attorneys who participate in this survey are qualified, active and full-time litigators. Our original question, written in the first person, asked: “I am a civil litigator” Yes or No.

This question leaves open the option for attorneys who mostly handle DUI, eviction, divorce, family law, and other misc. legal matters, but who only occasionally may file a lawsuit. This is not the population we want to reach. This is a survey for active, full-time litigators.

We want to hear from attorneys who devote at least half their practice to civil litigation. If we include other attorneys who only file lawsuits on part-time basis, that may skew the survey data. As such, we changed the question to: “I am an active, full-time litigator” Yes or No.

NALFA's New Career Stages of a Litigator

2020-2022 NALFA Years of Litigation Experience			
#	Career Stage	Yrs. of Litigation Experience	Variance
1	Early	Less Than 2 Years	
2	Early	2-3 Years	1
3	Early	4-5 Years	1
4	Early	6-7 Years	1
5	Early	8-9 Years	1
6	Middle	10-12 Years	2
7	Middle	13-15 Years	2
8	Middle	16-18 Years	2
9	Middle	19-21 Years	2
10	Middle	22-25 Years	2
11	Late	26-29 Years	3
12	Late	30-33 Years	3
13	Late	34-37 Years	3
14	Late	38-42 Years	4
15	Late	43+ Years	

New 2023 NALFA Years of Litigation Experience			
#	Career Stage	Yrs. of Litigation Experience	Variance
1	Early	Less Than 2 Years	
2	Early	2-3 Years	1
3	Early	4-5 Years	1
4	Early	6-7 Years	1
5	Early	8-9 Years	1
6	Early Middle	10-11 Years	1
7	Early Middle	12-13 Years	1
8	Early Middle	14-15 Years	1
9	Early Middle	16-17 Years	1
10	Early Middle	18-19 Years	1
11	Middle	20-22 Years	2
12	Middle	23-25 Years	2
13	Middle	26-28 Years	2
14	Middle	29-31 Years	2
15	Middle	32-34 Years	2
16	Late	35-37 Years	2
17	Late	38-40 Years	2
18	Late	41-43 Years	2
19	Late	44-46 Years	2
20	Late	47+ Years	

NALFA's New Hourly Rate Tier System

Every few years it's important to reevaluate our tier rate structure system.

2020-2022 NALFA Hourly Rate Tier System			
#	Rate Tier	Rate Range	Variance
1	Tier 1	Less Than \$200	
2	Tier 1	\$200-\$250	50
3	Tier 1	\$251-\$300	49
4	Tier 1	\$301-\$350	49
5	Tier 1	\$351-\$400	49
6	Tier 2	\$401-\$450	49
7	Tier 2	\$451-\$500	49
8	Tier 2	\$501-\$550	49
9	Tier 2	\$551-\$600	49
10	Tier 2	\$601-\$650	49
11	Tier 3	\$651-\$700	49
12	Tier 3	\$701-\$750	49
13	Tier 3	\$751-\$800	49
14	Tier 3	\$801-\$850	49
15	Tier 3	\$851-\$900	49
16	Tier 4	\$901-\$950	49
17	Tier 4	\$951-\$1000	49
18	Tier 4	\$1001-\$1050	49
19	Tier 4	\$1051-\$1100	49
20	Tier 4	Over \$1100	

2020-2022 Rate Tier System			
Tier 1 (Less Than \$200-\$400)			
Tier 2 (\$401-\$650)			
Tier 3 (\$651-\$900)			
Tier 4 (\$901-Over \$1100)			

New 2023 NALFA Hourly Rate Tier System			
#	Rate Tier	Rate Range	Variance
1	Tier 1	\$250 or Less	
2	Tier 1	\$251-\$300	49
3	Tier 1	\$301-\$350	49
4	Tier 1	\$351-\$400	49
5	Tier 1	\$401-\$450	49
6	Tier 2	\$451-\$500	49
7	Tier 2	\$501-\$550	49
8	Tier 2	\$551-\$600	49
9	Tier 2	\$601-\$650	49
10	Tier 2	\$651-\$700	49
11	Tier 3	\$701-\$750	49
12	Tier 3	\$751-\$800	49
13	Tier 3	\$801-\$850	49
14	Tier 3	\$851-\$900	49
15	Tier 3	\$901-\$950	49
16	Tier 4	\$951-\$1000	49
17	Tier 4	\$1001-\$1100	99
18	Tier 4	\$1101-\$1200	99
19	Tier 4	\$1201-\$1300	99
20	Tier 4	Over \$1300	

New 2023 Rate Tier System			
Tier 1 (\$250 or Less-\$450)			
Tier 2 (\$451-\$700)			
Tier 3 (\$701-\$950)			
Tier 4 (\$951-Over \$1300)			

Survey Stats

Survey Name: The 2023 Litigation Hourly Rate Survey

Survey Start Date: February 13, 2023

Survey End Date: September 22, 2023

Number of Survey Emails: 72

Number of Survey Questions: 10

Number of Survey Variables: 108

Number of Survey Participants: 28,488

Number of Full Survey Responses from Litigators: 24,817

Survey Process & Methodology

This hourly rate survey was conducted via electronic mail (e-mail). This survey was conducted through our email marketing vendor, Constant Contact, Inc. This hourly rate survey started on February 13, 2023 and closed on September 22, 2023. We sent out over 70 email campaigns to our proprietary e-mail database of over 495,000 attorneys from across the U.S. Our database contained litigators of all types – both plaintiff and defense counsel, from big law firms to solo shops, from big cities to small towns, and at all litigation experience levels.

We invited litigators to participate in this hourly rate survey. In order to incentivize them to participate, we offer all survey respondents the survey results at no cost. In order to prevent duplicate responses, once litigators participated in the survey, they were removed from our email database. Throughout the 5-month survey campaign, we carefully tracked the open rate, click rate, participation rate, and response rate.

The total number of participants in this hourly rate survey was **28,488**. Of this, there were **24,817** who fully completed the survey and were valid litigators. We did not include missing or deficient responses in our survey totals and results. With 24,817 qualified, full-time litigators answering 10 questions with 108 variables, we had over a million data points and intra-data points to analyze.

Survey Totals

Question No. 1: I am an Active, Full-Time ($\geq 50\%$ of practice devoted to litigation) Civil Litigator?

1. I am an active, full-time ($\geq 50\%$ of practice devoted to litigation) civil litigator:		No. of Responses	Response Ratio
Yes	96.45%	24,817	96.45%
No	3.54%	912	3.54%
Totals	100.00%	25,729	100.00%

Question No. 1: Our first question was a qualifying question. This question provided us with the correct pool of responses from which to work. We did not include data where attorneys answered no. We only used the data where attorneys answered in the affirmative.

Question No. 2: In my litigation practice (i.e. civil, tort, commercial, etc.), I mostly represent:

2. In my litigation practice (i.e. civil, tort, commercial, etc.), I mostly represent:	No. of Responses	Response Ratio
Defense	11,498	46.33%
Plaintiffs	13,319	53.66%
Totals	24,817	100.00%

Question No. 2: It's important to identify the party in litigation. This qualitative question sets the litigation party-side: defense or plaintiffs. We only provided 2 possible responses. Knowing that many litigators, do both defense and plaintiffs' work, we made litigators choose a side by using the qualifying term **mostly**.

Question No. 3: As a litigator, I work in a:

3. As a litigator, I work in a:		No. of Responses	Response Ratio
Solo Law Office (1 Attys)		16.81%	4,174 16.81%
Law Office (2-11 Attys)		19.77%	4,908 19.77%
Small Law Firm (12-49 Attys)		19.68%	4,884 19.68%
Mid-Size Law Firm (50-99 Attys)		21.57%	5,355 21.57%
Large Law Firm (100+ Attys)		22.14%	5,496 22.14%
Totals		100.00%	24,817 100.00%

Question No. 3: It is important to know the setting in which litigators work. This qualitative question asked about the size of litigation practice. We provided 6 possible responses. The size of the law practice is the least important factor (if at all) in determining hourly rates. Some have suggested that the largest law firms (i.e. NLJ 250) have the highest rates. But here correlation doesn't equal causation. Unfortunately, there was not have enough data to provide any rate conclusions for non-profit organizations.

Question No. 4: My position / role in my litigation practice is best described as:

4. My position / role in my litigation practice is best described as:		No. of Responses	Response Ratio
Associate		24.24%	6,016
Senior Associate		25.78%	6,400
Partner		26.11%	6,482
Senior / Managing Partner		23.85%	5,919
Total		100.00%	24,817

Question No. 4: This question was asked to compliment the years of litigation experience question. This question allows only 3 broad responses, instead of the 15 narrow responses in the following question.

Question No. 5: I've been continuously practicing litigation for:

5. I've been continuously practicing litigation for:		No. of Responses	Response Ratio
Less than 2 Years	5.28%	1,312	5.28%
2-3 Years	4.56%	1,132	4.56%
4-5 Years	4.03%	1,002	4.03%
6-7 Years	4.54%	1,129	4.54%
8-9 Years	4.94%	1,228	4.94%
10-11 Years	4.75%	1,179	4.75%
12-13 Years	4.11%	1,022	4.11%
14-15 Years	4.33%	1,075	4.33%
16-17 Years	4.67%	1,159	4.67%
18-19 Years	4.77%	1,186	4.77%
20-22 Years	5.49%	1,363	5.49%
23-25 Years	5.37%	1,333	5.37%
26-28 Years	5.93%	1,472	5.93%
29-31 Years	5.86%	1,456	5.86%
32-34 Years	5.28%	1,312	5.28%
35-37 Years	5.25%	1,303	5.25%
38-40 Years	5.00%	1,241	5.00%
41-43 Years	5.10%	1,266	5.10%
44-46 Years	4.87%	1,211	4.87%
47+ Years	5.78%	1,436	5.78%
Totals	100.00%	24,817	100.00%

Question No. 5: This quantitative question gets at years of continuous litigation experience. We provide 15 possible responses that span the career of a litigator.

Question No. 6: I practice litigation in:

6. I practice litigation in:		No. of Responses	Response Ratio
Washington, DC	4.07%	1,012	4.07%
San Francisco, CA	4.21%	1,045	4.21%
New York, NY	4.08%	1,014	4.08%
Dallas, TX	4.06%	1,009	4.06%
Boston, MA	4.25%	1,056	4.25%
Los Angeles, CA	4.35%	1,081	4.35%
Chicago, IL	4.07%	1,012	4.07%
Houston, TX	4.10%	1,018	4.10%
Miami, FL	4.08%	1,013	4.08%
Philadelphia, PA	4.05%	1,007	4.05%
Atlanta, GA	4.33%	1,075	4.33%
San Diego, CA	4.14%	1,028	4.14%
Seattle, WA	3.61%	898	3.61%
Pittsburgh, PA	3.73%	926	3.73%
Tampa, FL	3.67%	913	3.67%
Cleveland, OH	3.40%	846	3.40%
Charlotte, NC	3.73%	926	3.73%
Minneapolis, MN	3.40%	844	3.40%
Austin, TX	3.29%	818	3.29%
Nashville, TN	3.61%	898	3.61%
Denver, CO	3.35%	832	3.35%
Phoenix, AZ	3.57%	888	3.57%
Las Vegas, NV	3.28%	816	3.28%
New Orleans, LA	3.24%	806	3.24%
Another U.S. City	8.20%	2,036	8.20%
Totals	100.00%	24,817	100.00%

Question No. 6: The old adage that real estate is all about location, location, location also applies to hourly rates. This qualitative question asks about city / geography. We provide 25 possible responses. We list 24 cities and a response for "Another U.S. City". This would include any of the 24 cities not listed.

Question No. 7: My current, regular hourly rate for regular / routine litigation case falls within:

7. My current, regular hourly rate for <u>regular / routine</u> litigation cases falls within:	No. of Responses	Response Ratio
\$250 or Less	0.95%	237
\$251-\$300	1.97%	490
\$301-\$350	5.00%	1,242
\$351-\$400	7.02%	1,743
\$401-\$450	11.00%	2,732
\$451-\$500	11.99%	2,976
\$501-\$550	12.99%	3,225
\$551-\$600	10.00%	2,483
\$601-\$650	9.05%	2,247
\$651-\$700	7.97%	1,980
\$701-\$750	4.97%	1,234
\$751-\$800	5.00%	1,243
\$801-\$850	3.06%	760
\$851-\$900	2.00%	498
\$901-\$950	1.93%	481
\$951-\$1000	1.25%	312
\$1001-\$1100	0.87%	216
\$1101-\$1200	0.85%	211
\$1201-\$1300	0.83%	206
Over \$1300	1.21%	301
Totals	100.00%	24,817

Question No. 7: Reasonableness is a range, not an exact number. As such, we present a scale to litigators. This quantitative question asks about hourly rate ranges in regular or routine litigation. We provide 20 possible responses. The scale goes from \$250 or Less to Over \$1300. The variance is \$49.

Question No. 8: My current, regular hourly rate for complex litigation cases falls within:

8. My current, regular hourly rate for <u>complex</u> litigation cases falls within:		No. of Responses	Response Ratio
\$250 or Less	0.85%	211	0.85%
\$251-\$300	1.06%	265	1.06%
\$301-\$350	4.93%	1,224	4.93%
\$351-\$400	8.04%	1,997	8.04%
\$401-\$450	9.05%	2,248	9.05%
\$451-\$500	11.00%	2,732	11.00%
\$501-\$550	15.00%	3,724	15.00%
\$551-\$600	12.99%	3,224	12.99%
\$601-\$650	6.95%	1,727	6.95%
\$651-\$700	5.00%	1,241	5.00%
\$701-\$750	5.99%	1,488	5.99%
\$751-\$800	5.05%	1,254	5.05%
\$801-\$850	4.00%	995	4.00%
\$851-\$900	2.01%	499	2.01%
\$901-\$950	1.96%	487	1.96%
\$951-\$1000	1.87%	465	1.87%
\$1001-\$1100	1.43%	355	1.43%
\$1101-\$1200	0.84%	209	0.84%
\$1201-\$1300	0.81%	203	0.81%
Over \$1300	1.08%	269	1.08%
Totals	100.00%	24,817	100.00%

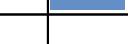
Question No. 8: Reasonableness is a range, not an exact number. As such, we present the same scale to litigators. This quantitative question asks about hourly rate ranges in complex litigation. We provide 20 possible responses. The scale goes from \$250 or Less to Over \$1300. The variance is \$49.

Question No. 9: As a litigator, the factor that determines my hourly rate the most is:

9. As a litigator, the factor that determines my hourly rate the most is:		No. of Responses	Response Ratio
Location / Geography		25.07%	6,222 25.07%
Years of Experience / Seniority		34.96%	8,677 34.96%
Practice Area / Complexity of Case		14.96%	3,713 14.96%
Economics / Relationship with Client		19.99%	4,961 19.99%
Law Practice Size		5.01%	1,244 5.01%
Totals		100.00%	24,817 100.00%

Question No. 9: This question get after the most important factor in determining hourly rates for litigators. We provide 5 potential responses.

Question No. 10: On average, I raise my hourly rate:

10. On average, I raise my hourly rate:		No. of Responses	Response Ratio
Every Year		14.95%	3,712 14.95%
Every 2 Years		30.35%	7,532 30.35%
Every 3 Years		25.11%	6,232 25.11%
Every 4 Years		19.65%	4,878 19.65%
Every 5 Years		9.92%	2,463 9.92%
Totals		100.00%	24,817 100.00%

Question No. 10: This question gets after the frequency of hourly rate increases. We provide 5 potential responses.

Conduct Your Own Hourly Rate Data Analysis

We let the hourly rate data speak for itself. Litigators and others can use this hourly rate survey to conduct their own rate analysis. Giving you access to the primary data allows litigators and others to perform their own macro and / or micro legal fee analysis. You can use the data sets to do your own rate analysis and draw your own actable rate intelligence. With over 100K data points, you can find:

Approx. Average Hourly Rates by Geography, Experience Level, and Firm Size

Combining Rate Data Points and Rate Data Sets

Percentile Distributions

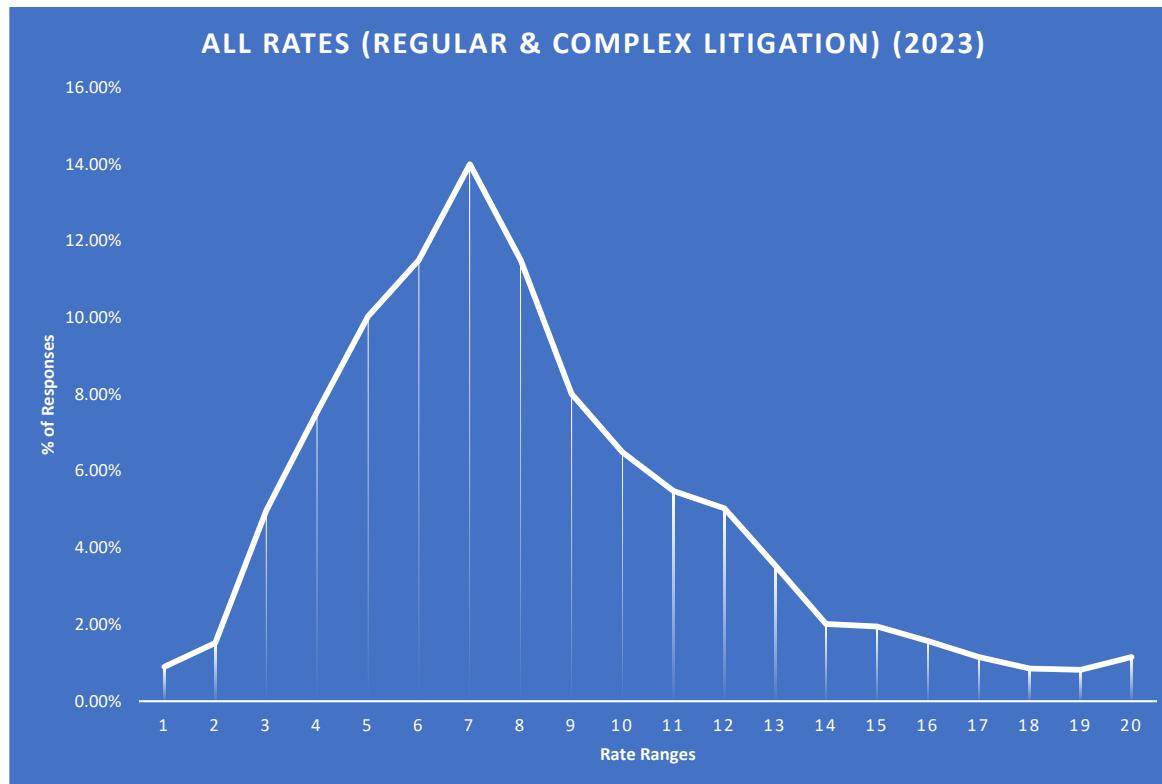
Use Advanced Analytics Techniques

And much, much more

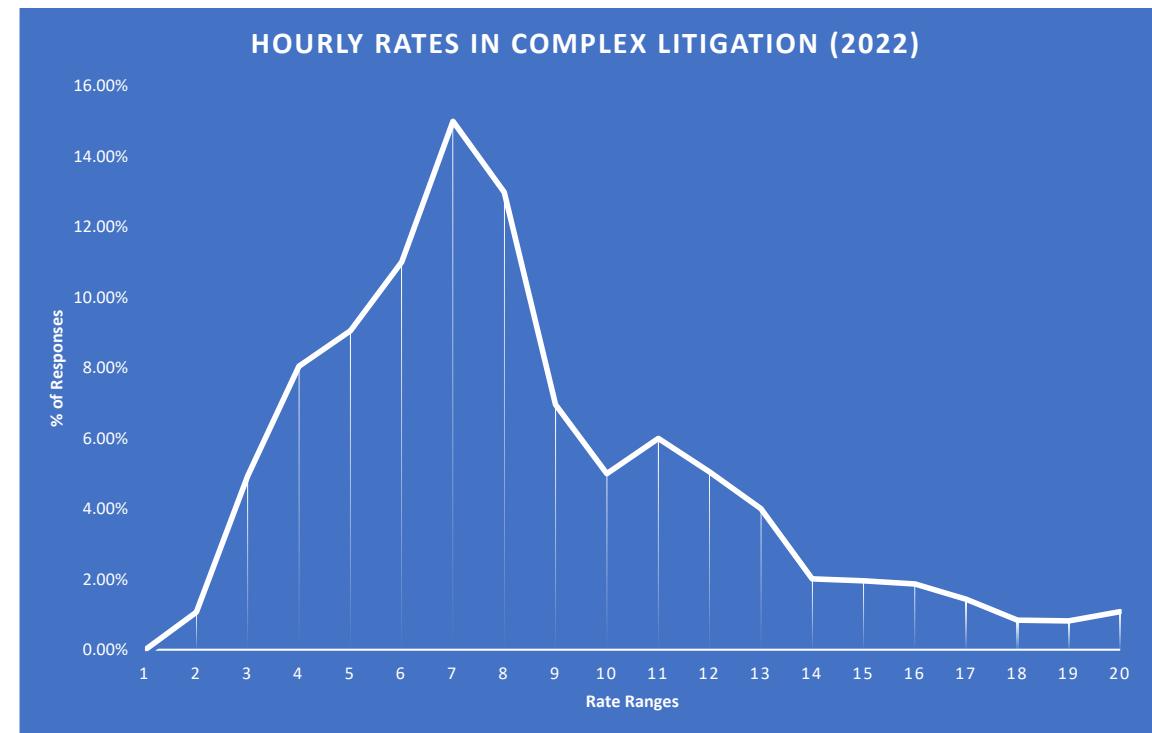
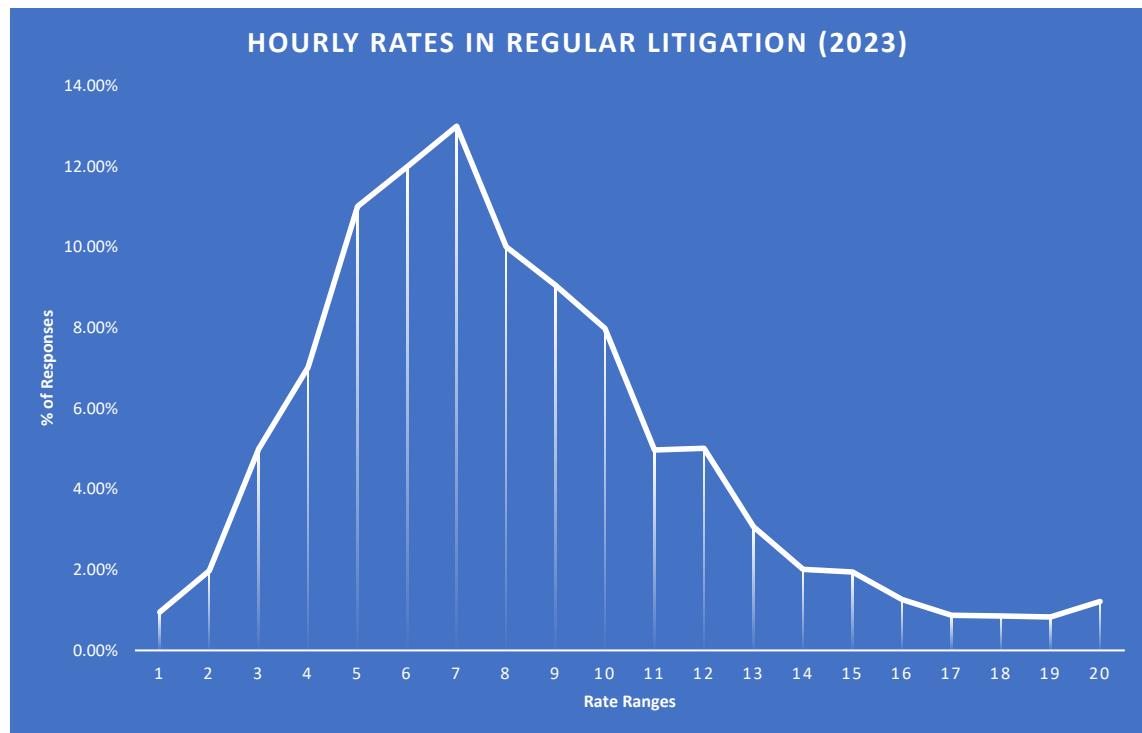
For people who purchase this survey, NALFA can provide the excel spreadsheets to help you organize the data as you see fit. This also allows you to create your own charts and graphs. We also provide a tutorial to help explain the data, show how to conduct rate analysis, and answer any questions.

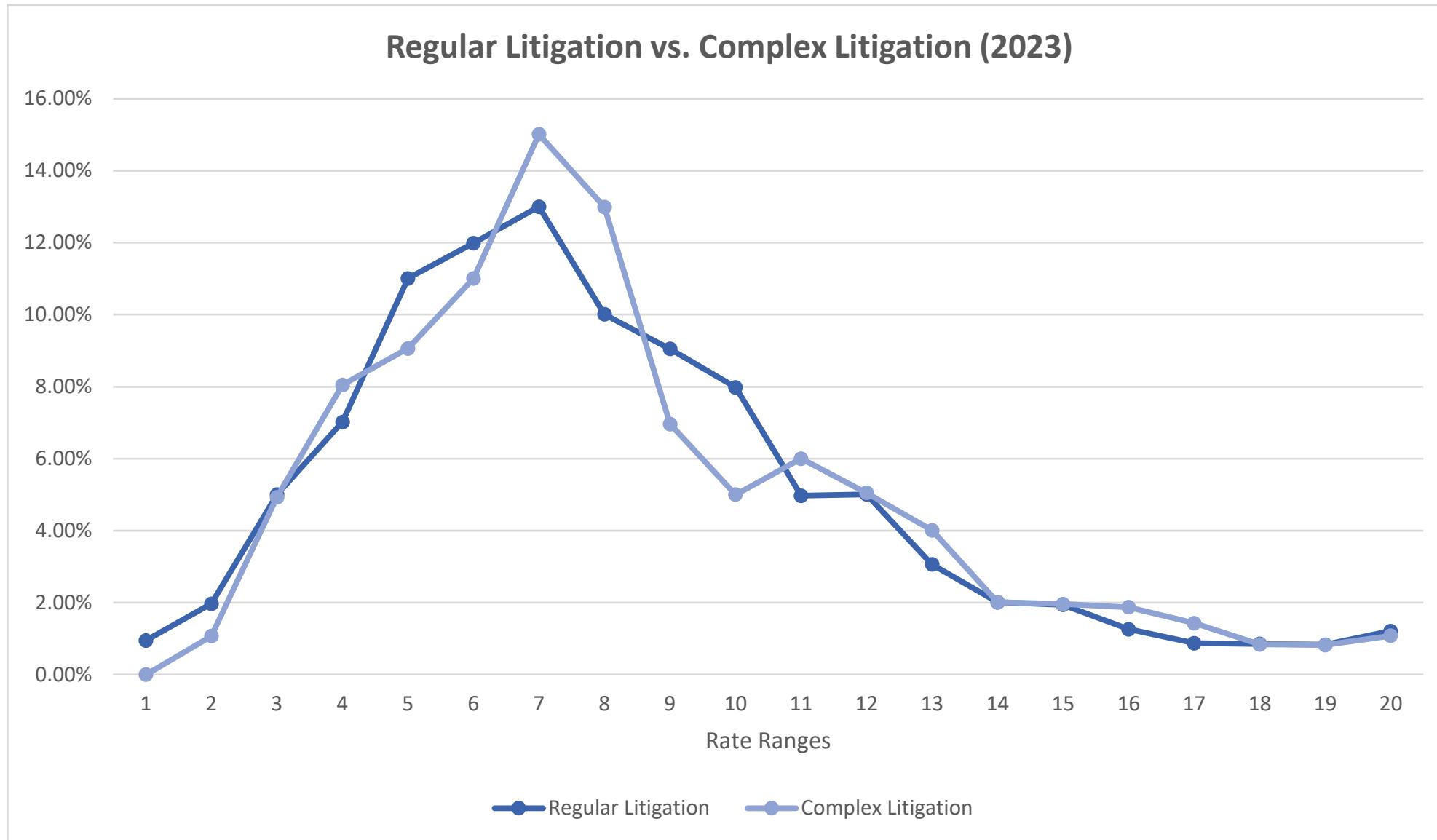
Distribution of Hourly Rate Data

When we plot our hourly rate responses on a graph (x, y axis), we have a general shape distribution model known as Chi-Squared distribution (goodness of fit). That is, the distribution is not the normal bell-shaped curve. Our model here starts from a low point, peaks before the midpoint, then declining gradually and finishing with a long tail with an uptick at the very end. It resembles a whale-shaped type distribution. The vertical axis (y axis) is the percentage of responses and the horizontal (x axis) corresponds to the 20 rate ranges.

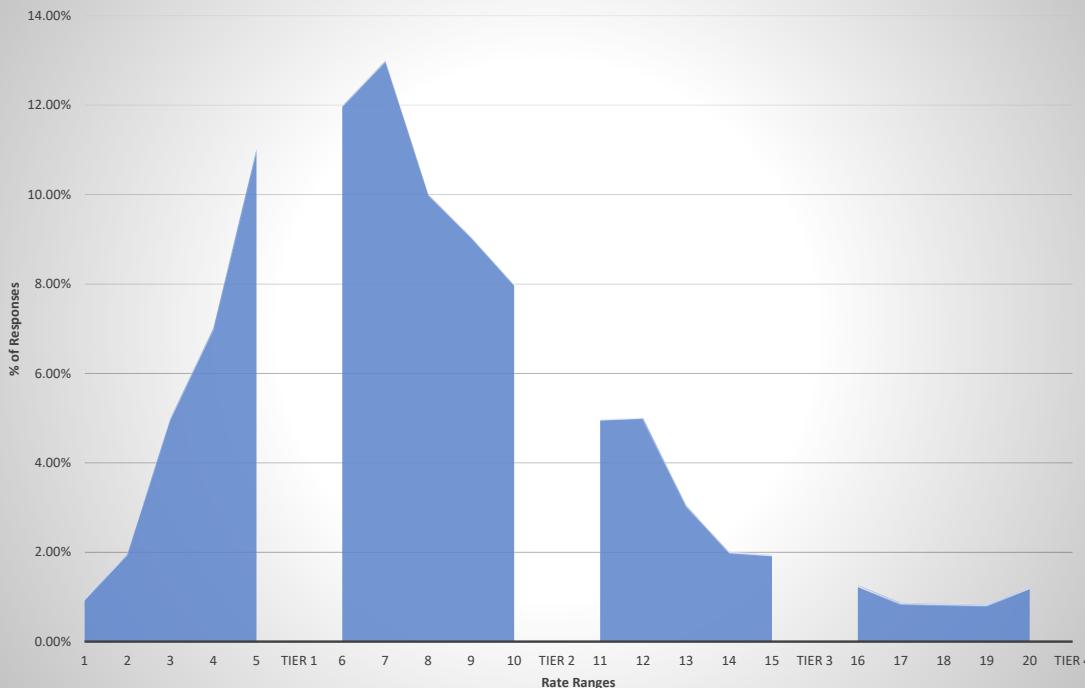


Macro Rate Data

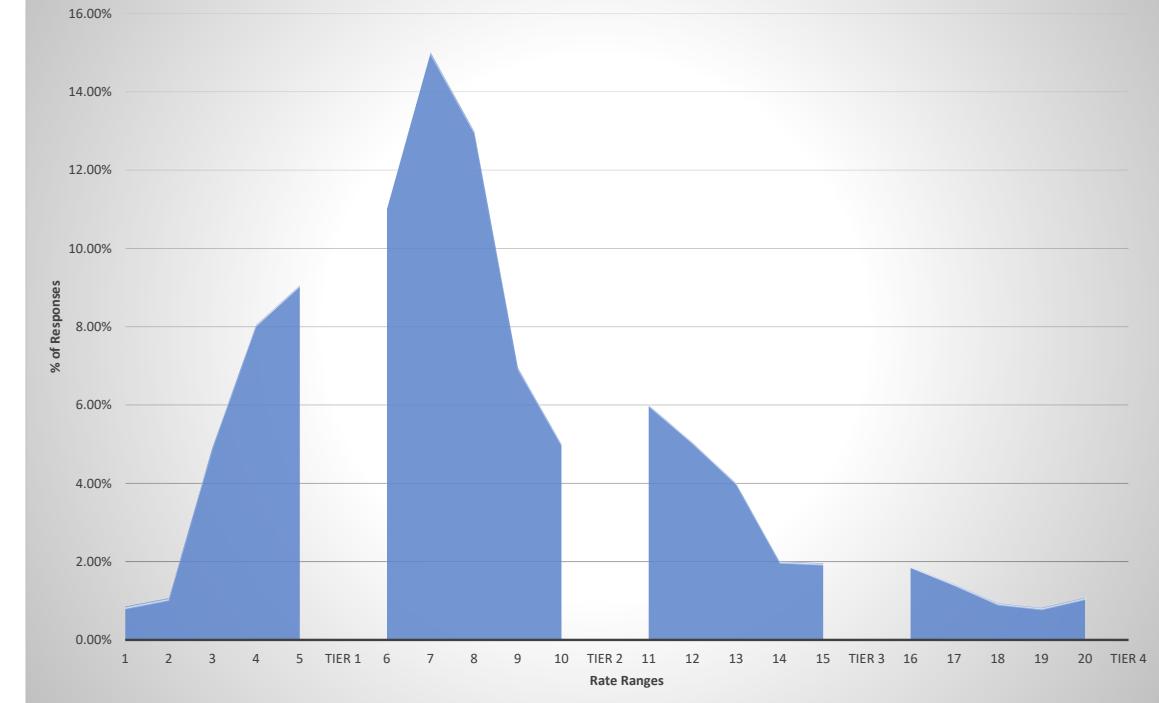




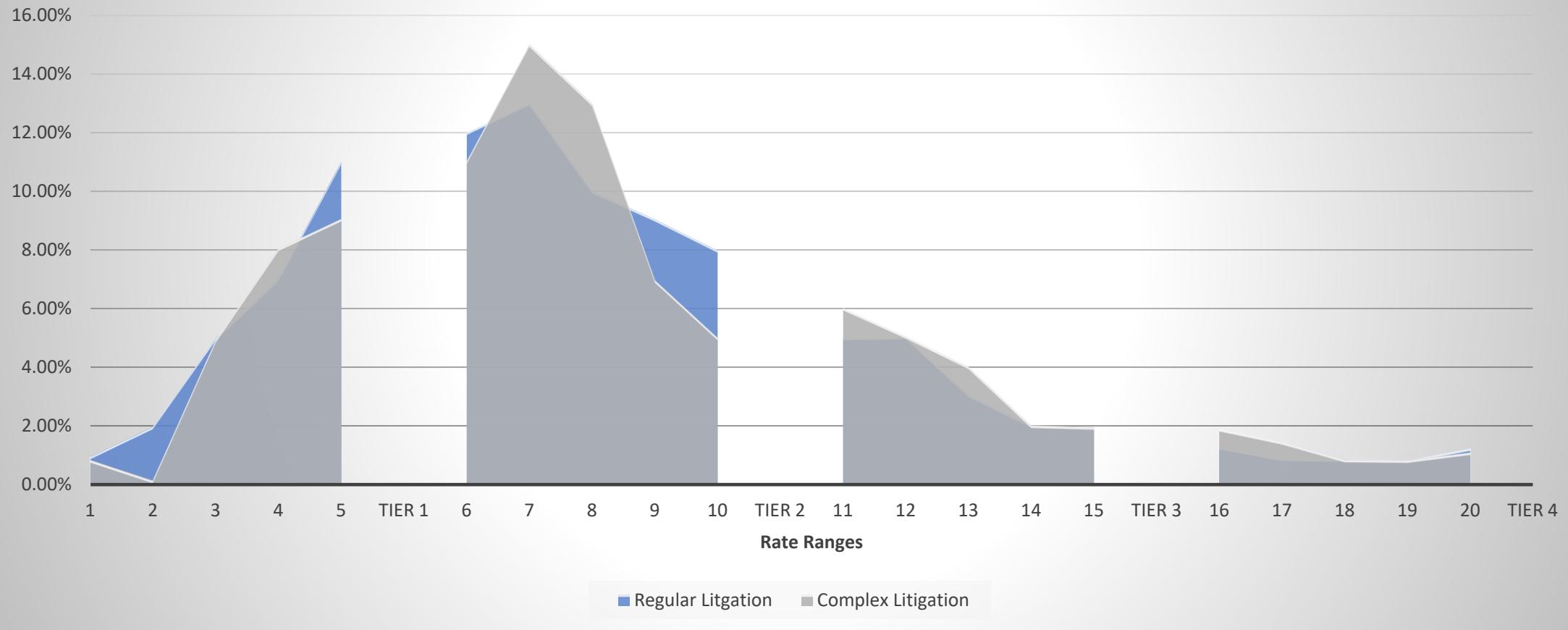
Hourly Rates in Regular Litigation by Tiers (2023)



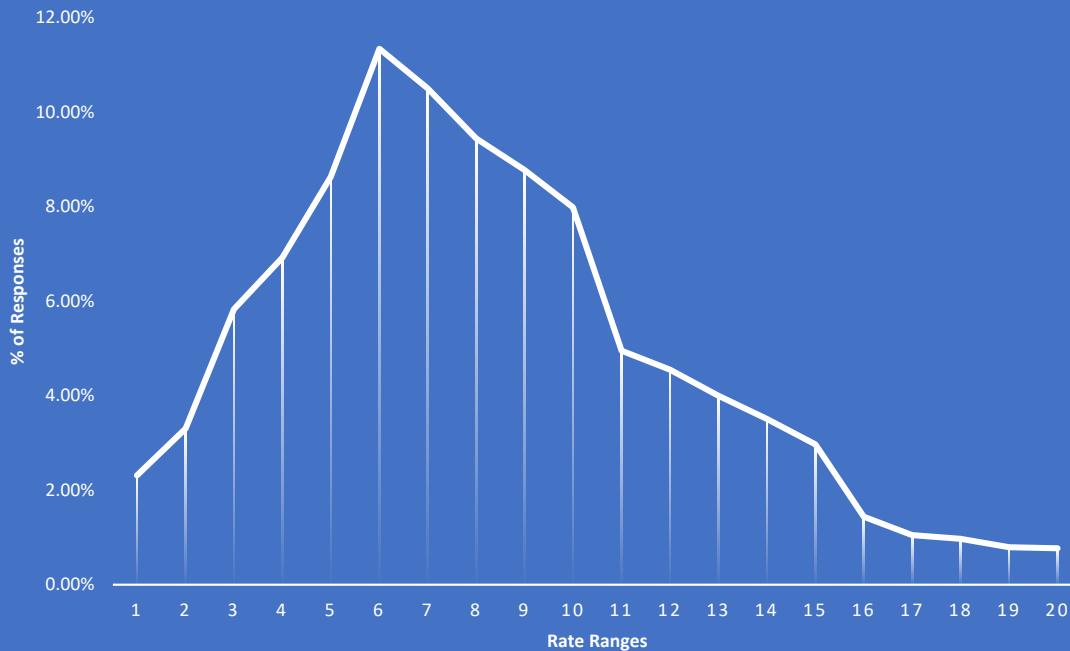
Hourly Rates in Complex Litigation by Tiers (2023)



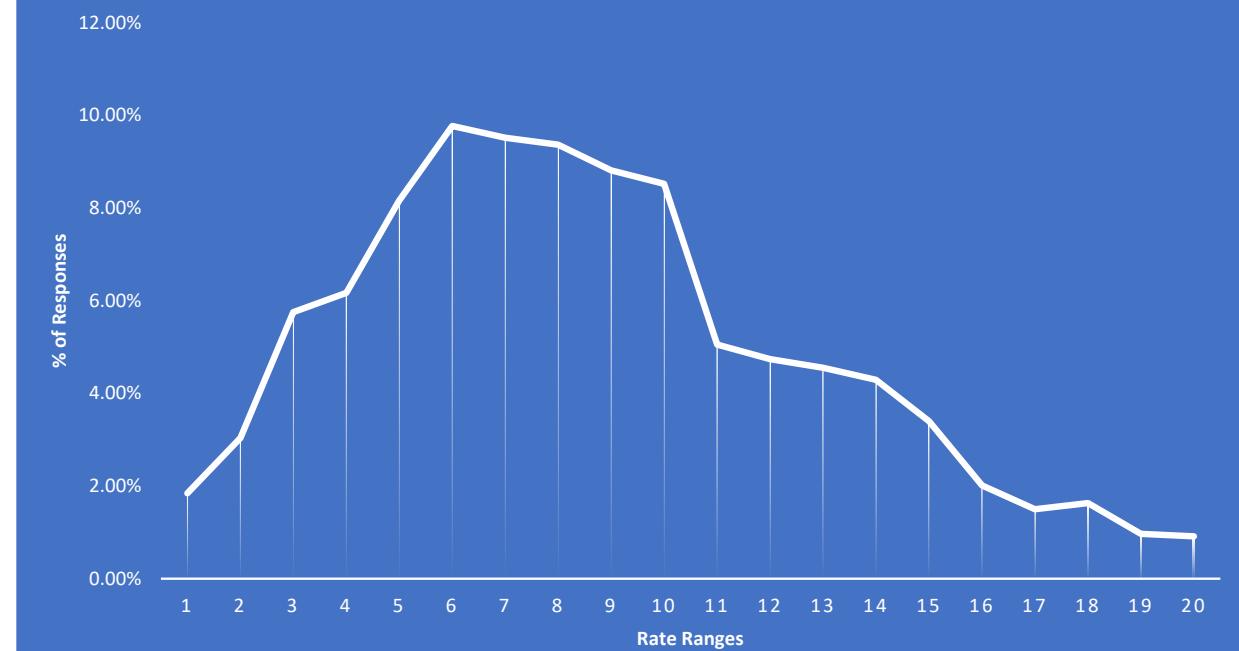
Regular vs. Complex Litigation by Tiers (2023)



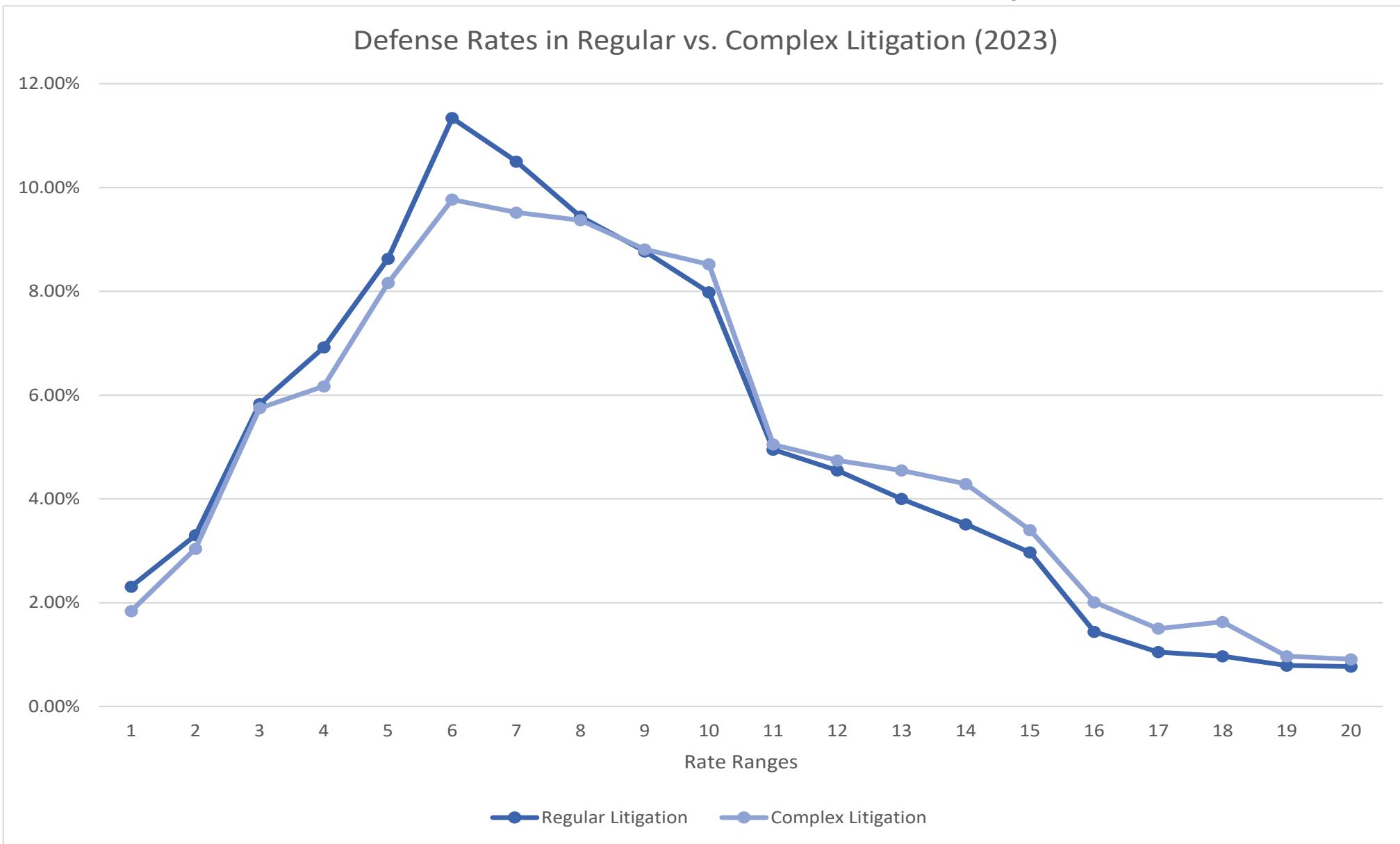
DEFENSE RATES IN REGULAR LITIGATION (2023)



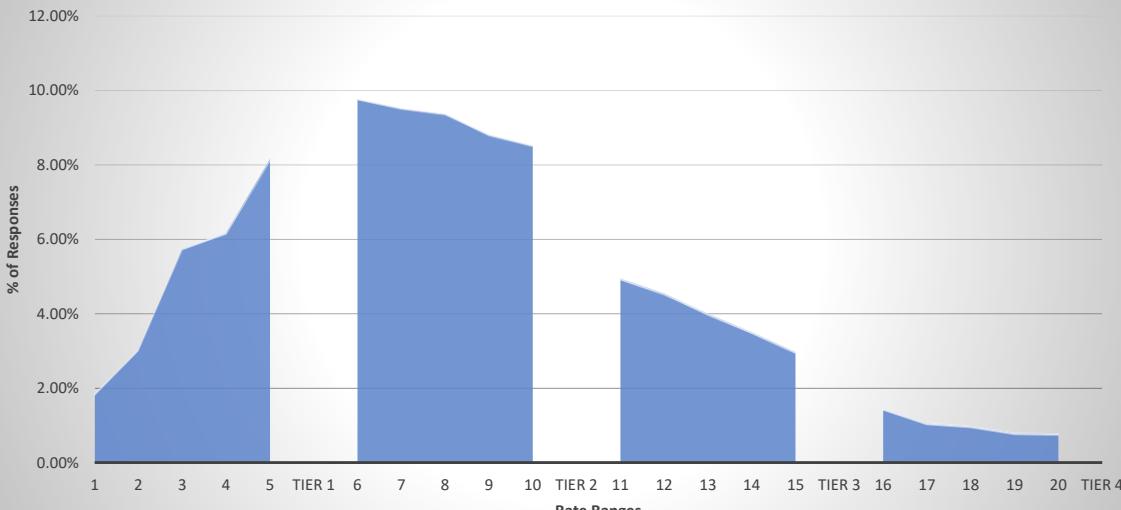
DEFENSE RATES IN COMPLEX LITIGATION (2022)



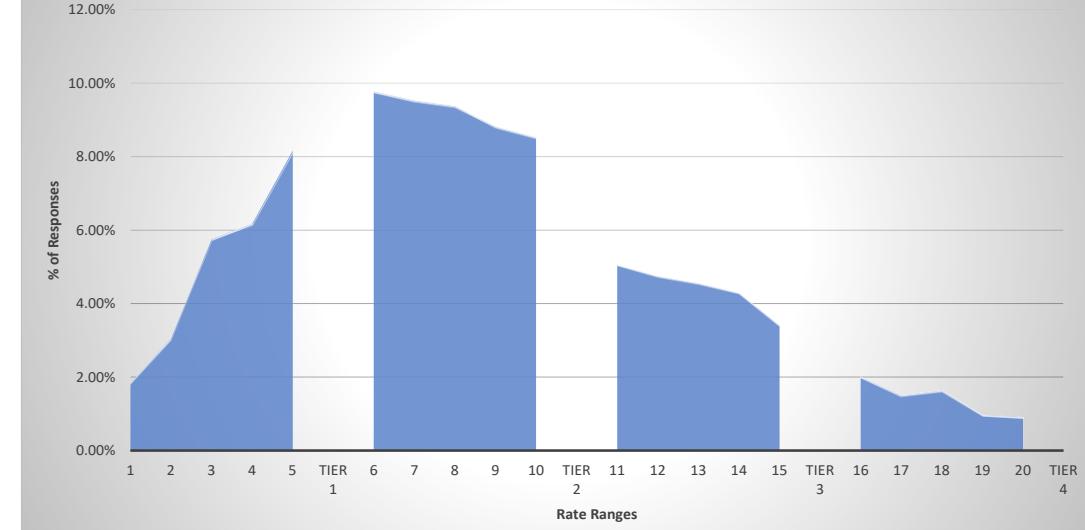
Defense Rates in Regular vs. Complex Litigation (2023)



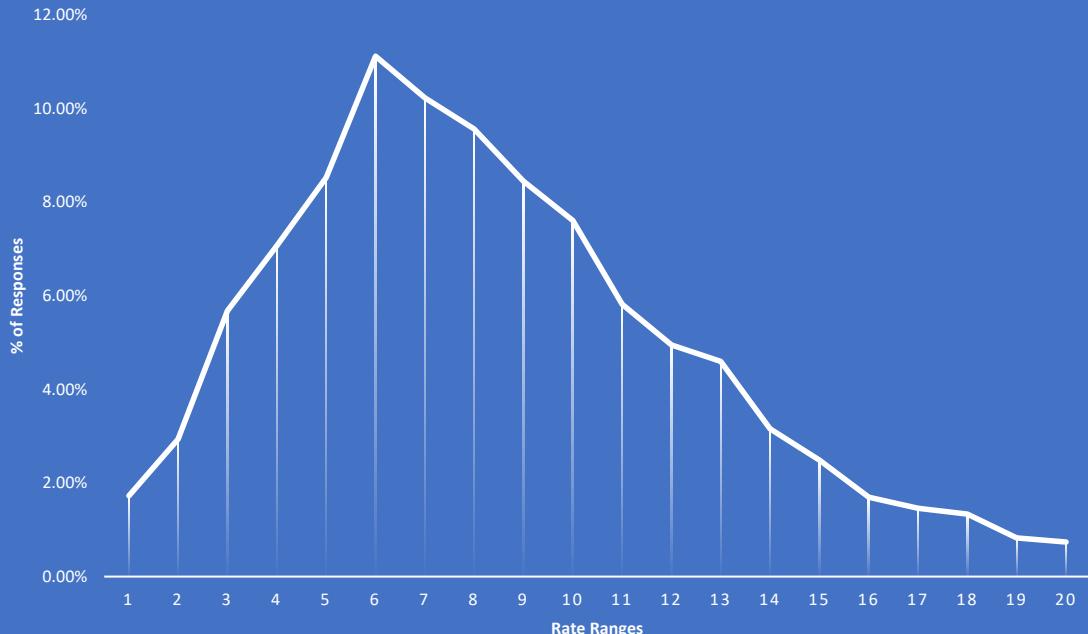
Defense Rates in Regular Litigation by Tiers (2023)



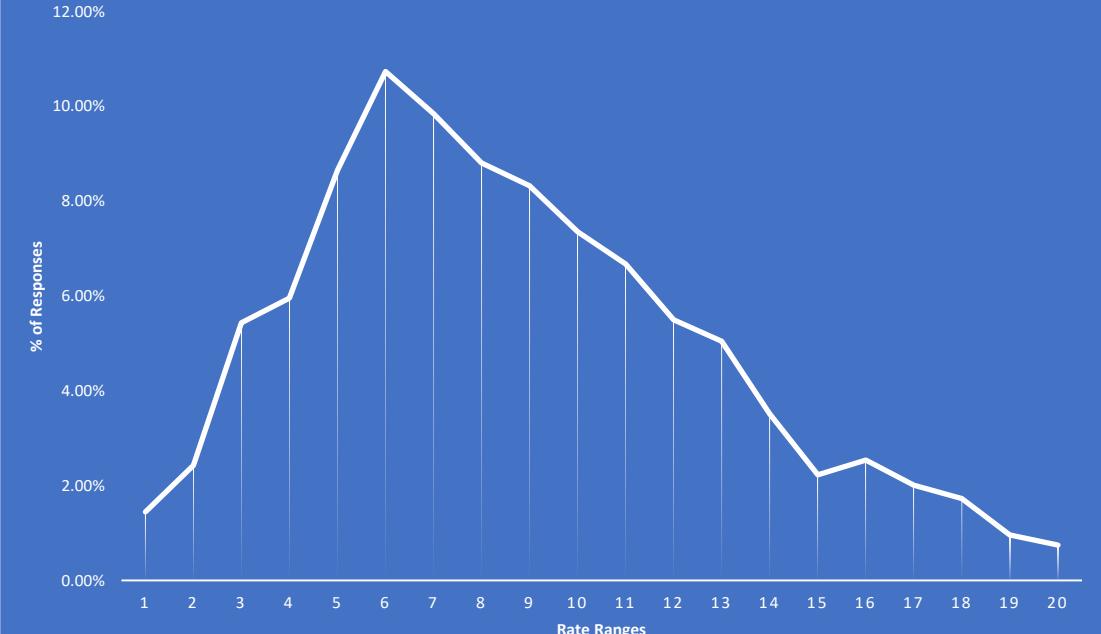
Defense Rates in Complex Litigation by Tiers (2023)

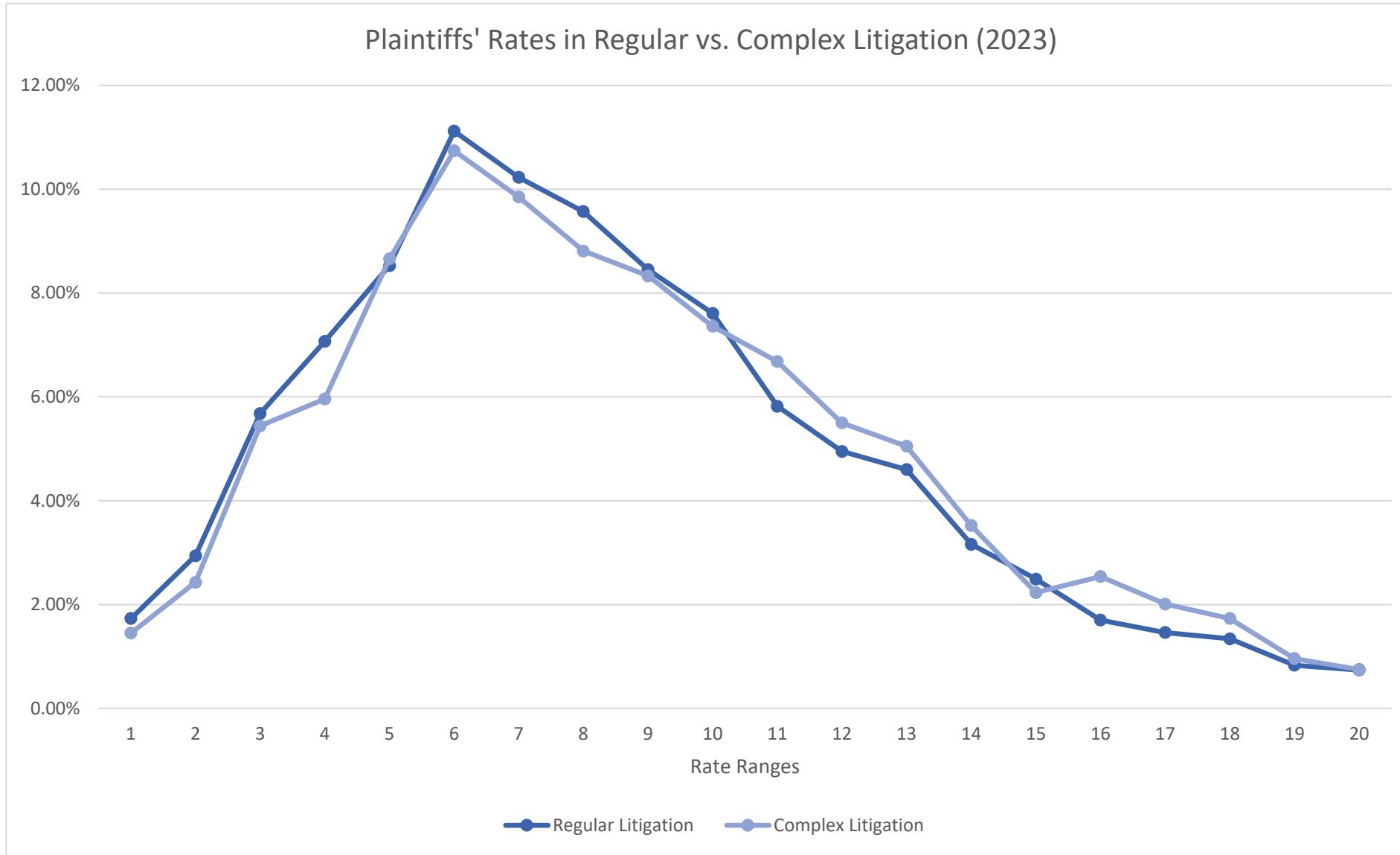


PLAINTIFFS' RATES IN REGULAR LITIGATION (2023)

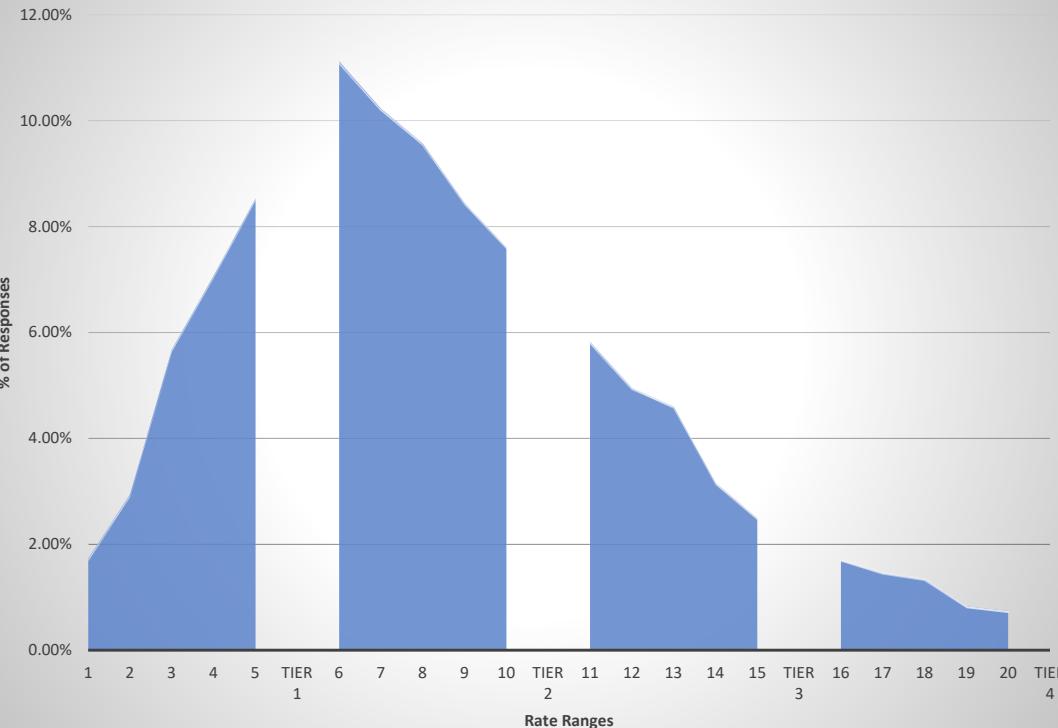


PLAINTIFFS' RATES IN COMPLEX LITIGATION (2023)

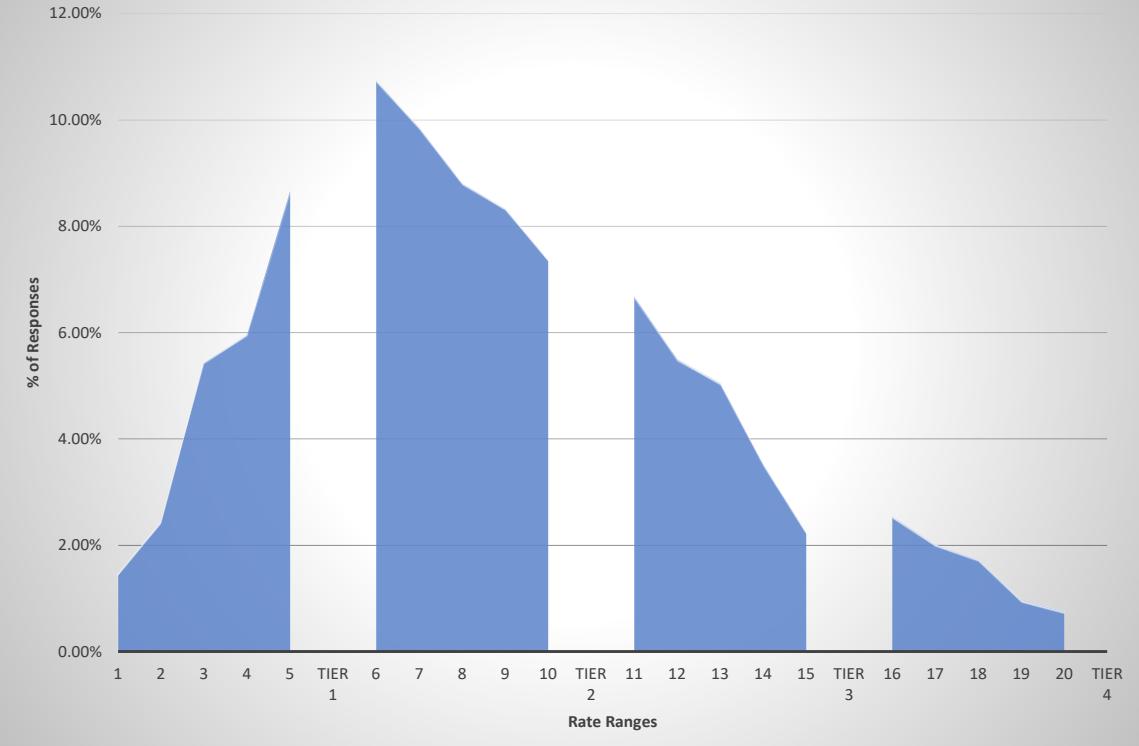


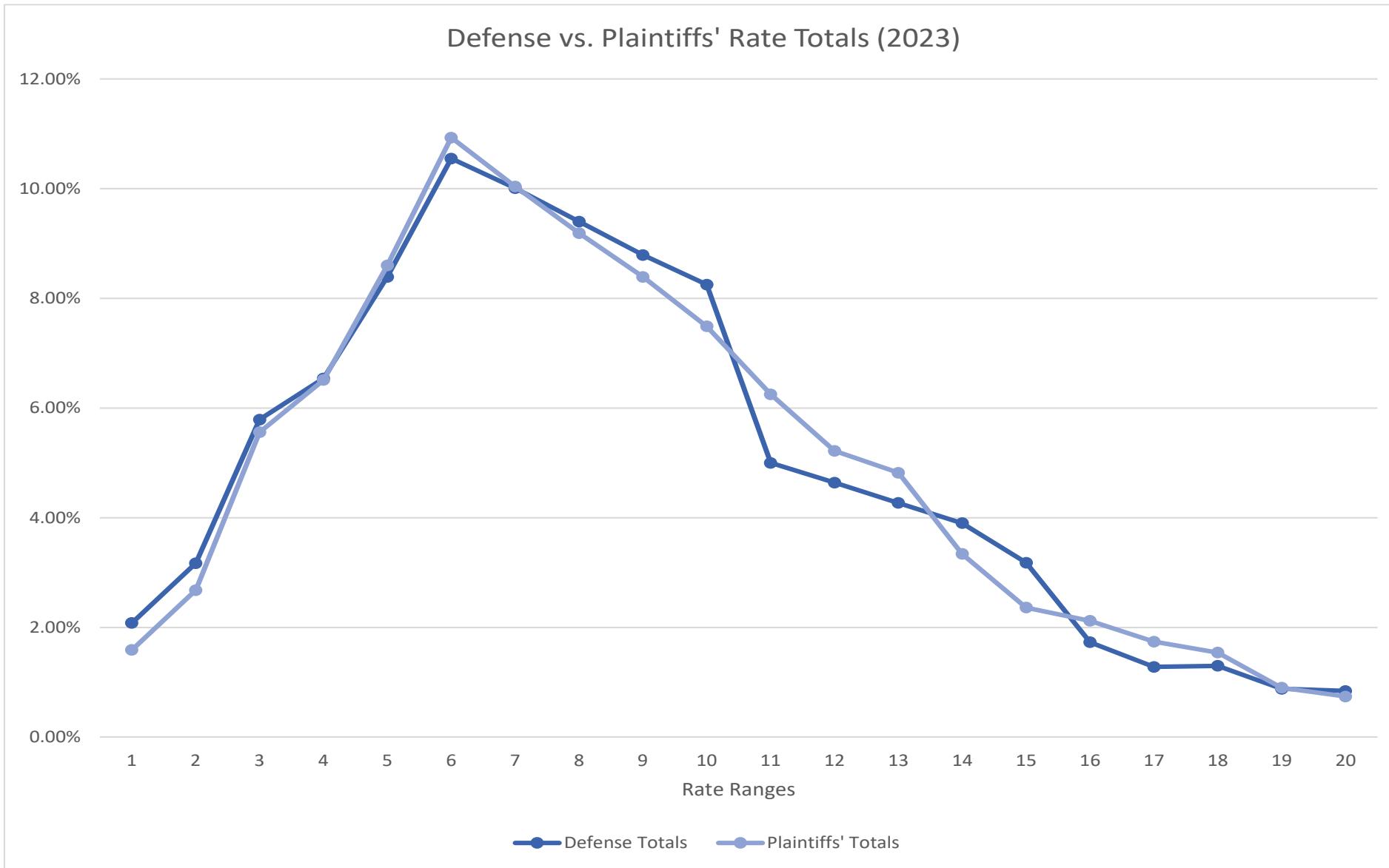


Plaintiffs' Rates in Regular Litigation by Tiers (2023)



Plaintiffs' Rates in Complex Litigation by Tiers (2023)





Survey Response Data

Response Rate by City / Geo							
	City	Defense	%	Plaintiff	%	Totals	%
	Washington, DC	432	3.76%	580	4.35%	1,012	4.08%
	San Francisco, CA	444	3.86%	601	4.51%	1,045	4.21%
	New York, NY	451	3.92%	563	4.23%	1,014	4.09%
	Dallas, TX	466	4.05%	543	4.08%	1,009	4.07%
	Boston, MA	447	3.89%	609	4.57%	1,056	4.26%
	Los Angeles, CA	491	4.27%	590	4.43%	1,081	4.36%
	Chicago, IL	475	4.13%	537	4.03%	1,012	4.08%
	Houston, TX	433	3.77%	585	4.39%	1,018	4.10%
	Miami, FL	407	3.54%	606	4.55%	1,013	4.08%
	Philadelphia, PA	475	4.13%	532	3.99%	1,007	4.06%
	Atlanta, GA	504	4.38%	571	4.29%	1,075	4.33%
	San Diego, CA	503	4.37%	525	3.94%	1,028	4.14%
	Seattle, WA	451	3.92%	447	3.36%	898	3.62%
	Pittsburgh, PA	480	4.17%	446	3.35%	926	3.73%
	Tampa, FL	415	3.61%	498	3.74%	913	3.68%
	Cleveland, OH	420	3.65%	426	3.20%	846	3.41%
	Charlotte, NC	433	3.77%	493	3.70%	926	3.73%
	Minneapolis, MN	411	3.57%	433	3.25%	844	3.40%
	Austin, TX	388	3.37%	430	3.23%	818	3.30%
	Nashville, TN	422	3.67%	476	3.57%	898	3.62%
	Denver, CO	396	3.44%	436	3.27%	832	3.35%
	Phoenix, AZ	398	3.46%	490	3.68%	888	3.58%
	Las Vegas, NV	380	3.30%	436	3.27%	816	3.29%
	New Orleans, LA	395	3.44%	411	3.09%	806	3.25%
	Another U.S. City	981	8.53%	1,055	7.92%	2,036	8.20%
	Totals	11,498	100%	13,319	100.0%	24,817	100%

Response Rate by Position / Title							
	Position Title / Role	Defense	%	Plaintiffs	%	Totals	%
1	Associate	2,827	24.59%	3,189	23.94%	6,016	24.24%
2	Senior Associate	3,136	27.27%	3,264	24.51%	6,400	25.79%
3	Partner	3,371	29.32%	3,111	23.36%	6,482	26.12%
4	Senior / Manging Partner	2,164	18.82%	3,755	28.19%	5,919	23.85%
Totals		11,498	100%	13,319	100%	24,817	100%

Response Rate by Years of Litigation Experience							
	Years of Litigation Experience	Defense	%	Plaintiffs	%	Totals	%
1	Less Than 2 Years	637	5.54%	675	5.07%	1,312	5.29%
2	2-3 Years	525	4.57%	607	4.56%	1,132	4.56%
3	4-5 Years	461	4.01%	541	4.06%	1,002	4.04%
4	6-7 Years	500	4.35%	629	4.72%	1,129	4.55%
5	8-9 Years	544	4.73%	684	5.14%	1,228	4.95%
6	10-11 Years	568	4.94%	611	4.59%	1,179	4.75%
7	12-13 Years	467	4.06%	555	4.17%	1,022	4.12%
8	14-15 Years	489	4.25%	586	4.40%	1,075	4.33%
9	16-17 Years	521	4.53%	638	4.79%	1,159	4.67%
10	18-19 Years	522	4.54%	664	4.99%	1,186	4.78%
11	20-22 Years	621	5.40%	742	5.57%	1,363	5.49%
12	23-25 Years	649	5.64%	684	5.14%	1,333	5.37%
13	26-28 Years	725	6.31%	747	5.61%	1,472	5.93%
14	29-31 Years	716	6.23%	740	5.56%	1,456	5.87%
15	32-34 Years	611	5.31%	701	5.26%	1,312	5.29%
16	35-37 Years	589	5.12%	714	5.36%	1,303	5.25%
17	38-40 Years	549	4.77%	692	5.20%	1,241	5.00%
18	41-43 Years	600	5.22%	666	5.00%	1,266	5.10%
19	44-46 Years	559	4.86%	652	4.90%	1,211	4.88%
20	47+ Years	645	5.61%	791	5.94%	1,436	5.79%
Totals		11,498	100%	13,319	100%	24,817	100%

Response Rate by Law Firm / Law Office Size							
	Law Office/Firm Size	Defense	%	Plaintiffs	%	Totals	%
1	Solo Law Office (1 Atty)	1,962	17.06%	2,212	16.61%	4,174	16.82%
2	Law Office (2-11 Attys)	2,404	20.91%	2,504	18.80%	4,908	19.78%
3	Small Law Firm (12-49 Attys)	2,344	20.39%	2,540	19.07%	4,884	19.68%
4	Mid-Size Law Firm (50-99 Attys)	2,785	24.22%	2,570	19.30%	5,355	21.58%
5	Large Law Firm (100+ Attys)	2,003	17.42%	3,493	26.23%	5,496	22.15%
Totals		11,498	100%	13,319	100%	24,817	100%

Response Rate by Regular & Complex Litigation							
Tier	Rate Range	Regular Rate	%	Complex Rate	%	Totals	%
1	\$250 or Less	237	0.95%	211	0.85%	448	0.90%
1	\$251-\$300	490	1.97%	265	1.07%	755	1.52%
1	\$301-\$350	1,242	5.00%	1,224	4.93%	2,466	4.97%
1	\$351-\$400	1,743	7.02%	1,997	8.05%	3,740	7.54%
1	\$401-\$450	2,732	11.01%	2,248	9.06%	4,980	10.03%
Tier 1 Sub Totals		6,444	25.97%	5,945	23.96%	12,389	24.96%
2	\$451-\$500	2,976	11.99%	2,732	11.01%	5,708	11.50%
2	\$501-\$550	3,225	13.00%	3,724	15.01%	6,949	14.00%
2	\$551-\$600	2,483	10.01%	3,224	12.99%	5,707	11.50%
2	\$601-\$650	2,247	9.05%	1,727	6.96%	3,974	8.01%
2	\$651-\$700	1,980	7.98%	1,241	5.00%	3,221	6.49%
Tier 2 Sub Totals		12,911	52.02%	12,648	50.97%	25,559	51.49%
3	\$701-\$750	1,234	4.97%	1,488	6.00%	2,722	5.48%
3	\$751-\$800	1,243	5.01%	1,254	5.05%	2,497	5.03%
3	\$801-\$850	760	3.06%	995	4.01%	1,755	3.54%
3	\$851-\$900	498	2.01%	499	2.01%	997	2.01%
3	\$901-\$950	481	1.94%	487	1.96%	968	1.95%
Tier 3 Sub Totals		4,216	16.99%	4,723	19.03%	8,939	18.01%
4	\$951-\$1000	312	1.26%	465	1.87%	777	1.57%
4	\$1001-\$1100	216	0.87%	355	1.43%	571	1.15%
4	\$1101-\$1200	211	0.85%	209	0.84%	420	0.85%
4	\$1201-\$1300	206	0.83%	203	0.82%	409	0.82%
4	Over \$1300	301	1.21%	269	1.08%	570	1.15%
Tier 4 Sub Totals		1,246	5.02%	1,501	6.05%	2,747	5.53%
Totals		24,817	100%	24,817	100%	49,634	100%

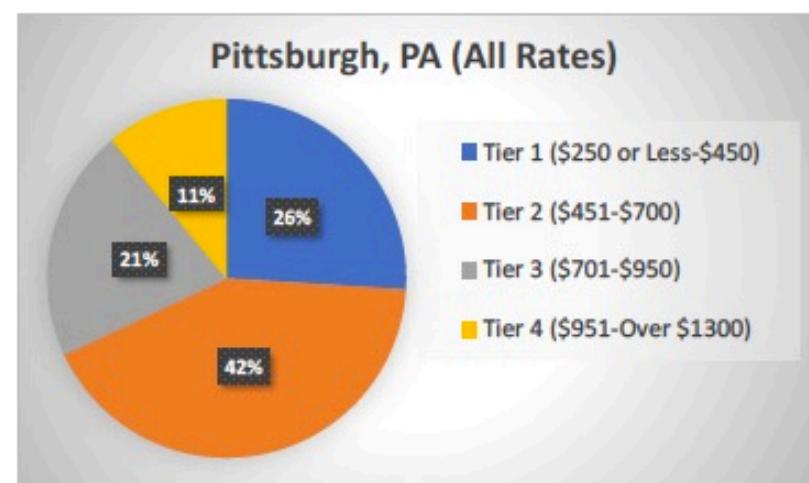
Response Rate Defense and Plaintiffs' Counsel (Regular & Complex Litigation)													
		Defense Counsel						Plaintiffs' Counsel					
Tier	Rate Range	Regular Rate	%	Complex Rate	%	Defense Totals	%	Regular Rate	%	Complex Rate	%	Plaintiffs' Totals	%
1	\$250 or Less	266	2.31%	212	1.84%	478	2.08%	231	1.73%	193	1.45%	424	1.59%
1	\$251-\$300	379	3.30%	350	3.04%	729	3.17%	391	2.94%	323	2.43%	714	2.68%
1	\$301-\$350	670	5.83%	661	5.75%	1,331	5.79%	756	5.68%	725	5.44%	1,481	5.56%
1	\$351-\$400	796	6.92%	709	6.17%	1,505	6.54%	941	7.07%	794	5.96%	1,735	6.51%
1	\$401-\$450	992	8.63%	938	8.16%	1,930	8.39%	1,136	8.53%	1,154	8.66%	2,290	8.60%
Tier 1 Sub Totals		3,103	26.99%	2,870	24.96%	5,973	25.97%	3,455	25.94%	3,189	23.94%	6,644	24.94%
2	\$451-\$500	1,304	11.34%	1,123	9.77%	2,427	10.55%	1,481	11.12%	1,431	10.74%	2,912	10.93%
2	\$501-\$550	1,207	10.50%	1,095	9.52%	2,302	10.01%	1,363	10.23%	1,312	9.85%	2,675	10.04%
2	\$551-\$600	1,085	9.44%	1,077	9.37%	2,162	9.40%	1,274	9.57%	1,173	8.81%	2,447	9.19%
2	\$601-\$650	1,008	8.77%	1,013	8.81%	2,021	8.79%	1,125	8.45%	1,109	8.33%	2,234	8.39%
2	\$651-\$700	917	7.98%	980	8.52%	1,897	8.25%	1,014	7.61%	980	7.36%	1,994	7.49%
Tier 2 Sub Totals		5,521	48.02%	5,288	45.99%	10,809	47.00%	6,257	46.98%	6,005	45.09%	12,262	46.03%
3	\$701-\$750	569	4.95%	581	5.05%	1,150	5.00%	775	5.82%	890	6.68%	1,665	6.25%
3	\$751-\$800	523	4.55%	545	4.74%	1,068	4.64%	659	4.95%	732	5.50%	1,391	5.22%
3	\$801-\$850	460	4.00%	523	4.55%	983	4.27%	613	4.60%	672	5.05%	1,285	4.82%
3	\$851-\$900	404	3.51%	493	4.29%	897	3.90%	421	3.16%	469	3.52%	890	3.34%
3	\$901-\$950	341	2.97%	391	3.40%	732	3.18%	331	2.49%	297	2.23%	628	2.36%
Tier 3 Sub Totals		2,297	19.98%	2,533	22.03%	4,830	21.00%	2,799	21.02%	3,060	22.97%	5,859	21.99%
4	\$951-\$1000	166	1.44%	231	2.01%	397	1.73%	226	1.70%	338	2.54%	564	2.12%
4	\$1001-\$1100	121	1.05%	173	1.50%	294	1.28%	195	1.46%	268	2.01%	463	1.74%
4	\$1101-\$1200	111	0.97%	187	1.63%	298	1.30%	178	1.34%	231	1.73%	409	1.54%
4	\$1201-\$1300	91	0.79%	111	0.97%	202	0.88%	111	0.83%	128	0.96%	239	0.90%
4	Over \$1300	88	0.77%	105	0.91%	193	0.84%	98	0.74%	100	0.75%	198	0.74%
Tier 4 Sub Totals		577	5.02%	807	7.02%	1,384	6.02%	808	6.07%	1,065	8.00%	1,873	7.03%
Totals		11,498	100%	11,498	100%	22,996	100%	13,319	100%	13,319	100%	26,638	100%

Micro Rate Data

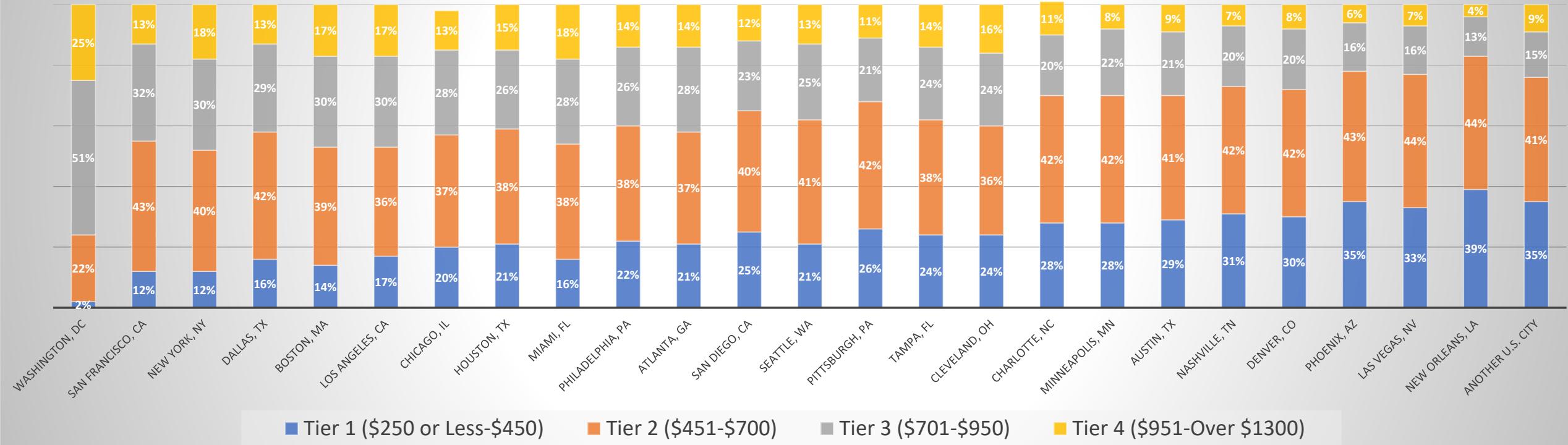
City / Geography

Pittsburgh, PA

2023 Rate Data for Pittsburgh, PA												
	Rate Tier	Rate Range	Defense		Plaintiffs		Totals				#	%
			Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates	#	#	%		
1	Tier 1	\$250 or Less	9	1.88%	7	1.46%	8	1.79%	6	1.35%	30	1.62%
2	Tier 1	\$251-\$300	19	3.96%	11	2.29%	13	2.91%	11	2.47%	54	2.92%
3	Tier 1	\$301-\$350	31	6.46%	27	5.63%	21	4.71%	29	6.50%	108	5.83%
4	Tier 1	\$351-\$400	28	5.83%	41	8.54%	40	8.97%	15	3.36%	124	6.70%
5	Tier 1	\$401-\$450	48	10.00%	39	8.13%	39	8.74%	42	9.42%	168	9.07%
Sub Totals			135	28.13%	125	26.04%	121	27.13%	103	23.09%	484	26.13%
6	Tier 2	\$451-\$500	44	9.17%	44	9.17%	44	9.87%	39	8.74%	171	9.23%
7	Tier 2	\$501-\$550	31	6.46%	45	9.38%	31	6.95%	38	8.52%	145	7.83%
8	Tier 2	\$551-\$600	42	8.75%	42	8.75%	33	7.40%	33	7.40%	150	8.10%
9	Tier 2	\$601-\$650	39	8.13%	41	8.54%	38	8.52%	45	10.09%	163	8.80%
10	Tier 2	\$651-\$700	41	8.54%	33	6.88%	41	9.19%	41	9.19%	156	8.42%
Sub Totals			197	41.04%	205	42.71%	187	41.93%	196	43.95%	785	42.39%
11	Tier 3	\$701-\$750	35	7.29%	30	6.25%	38	8.52%	33	7.40%	136	7.34%
12	Tier 3	\$751-\$800	19	3.96%	18	3.75%	19	4.26%	20	4.48%	76	4.10%
13	Tier 3	\$801-\$850	13	2.71%	13	2.71%	14	3.14%	11	2.47%	51	2.75%
14	Tier 3	\$851-\$900	11	2.29%	18	3.75%	13	2.91%	19	4.26%	61	3.29%
15	Tier 3	\$901-\$950	18	3.75%	12	2.50%	11	2.47%	15	3.36%	56	3.02%
Sub Totals			96	20.00%	91	18.96%	95	21.30%	98	21.97%	380	20.52%
16	Tier 4	\$951-\$1000	19	3.96%	17	3.54%	11	2.47%	15	3.36%	62	3.35%
17	Tier 4	\$1001-\$1100	7	1.46%	18	3.75%	14	3.14%	9	2.02%	48	2.59%
18	Tier 4	\$1101-\$1200	14	2.92%	7	1.46%	7	1.57%	10	2.24%	38	2.05%
19	Tier 4	\$1201-\$1300	8	1.67%	8	1.67%	9	2.02%	7	1.57%	32	1.73%
20	Tier 4	Over \$1300	4	0.83%	9	1.88%	3	0.67%	8	1.79%	24	1.30%
Sub Totals			52	10.83%	59	12.29%	44	9.87%	49	10.99%	204	11.02%
Totals			480	100%	480	100%	446	100%	446	100%	1852	100%

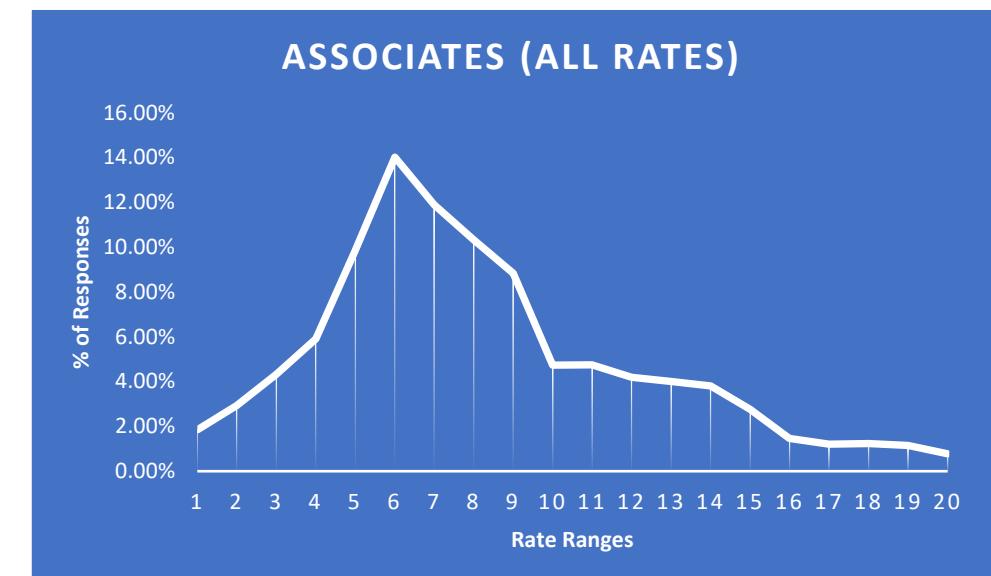
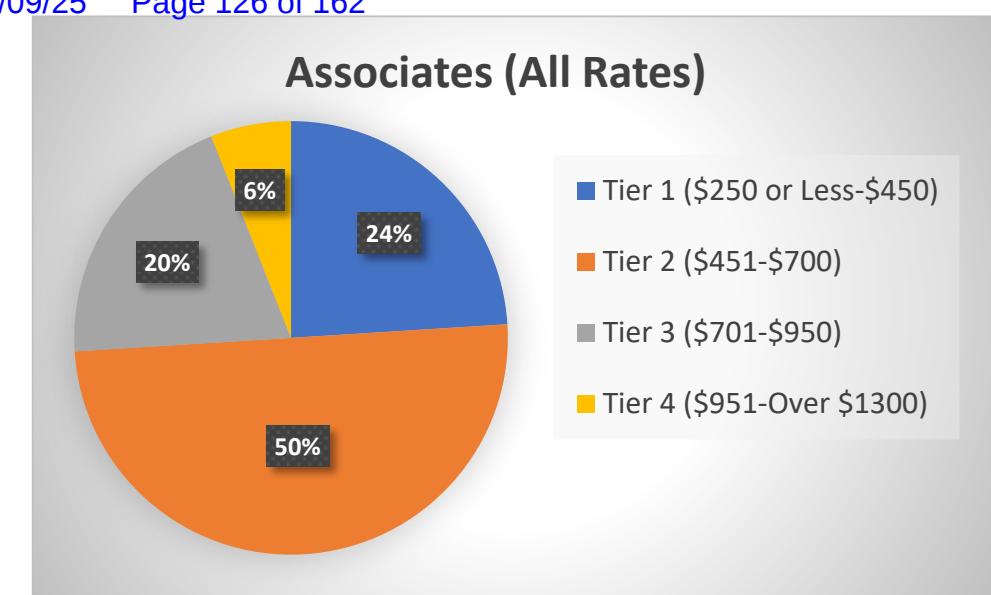


Cities by Tier Rate System (2023)

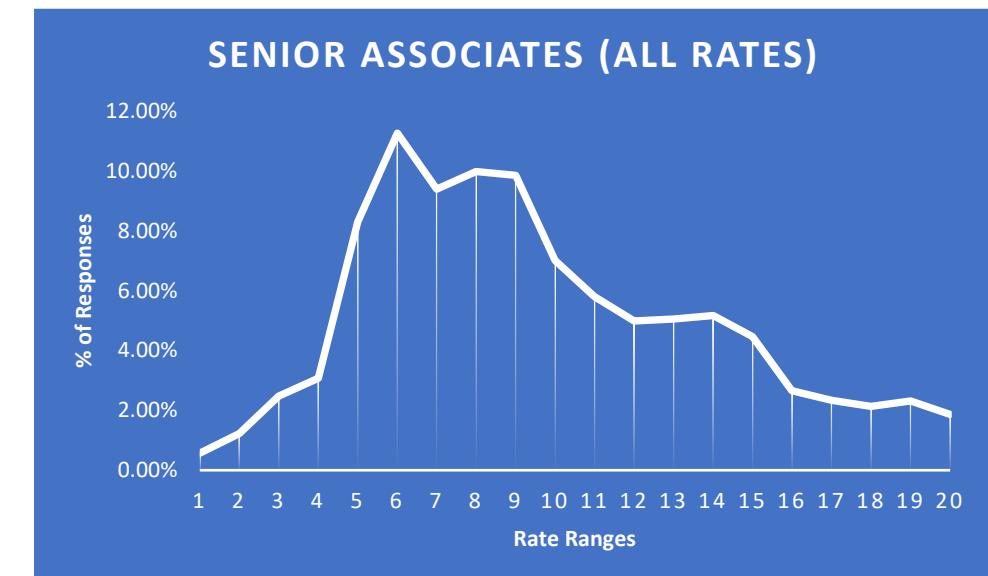
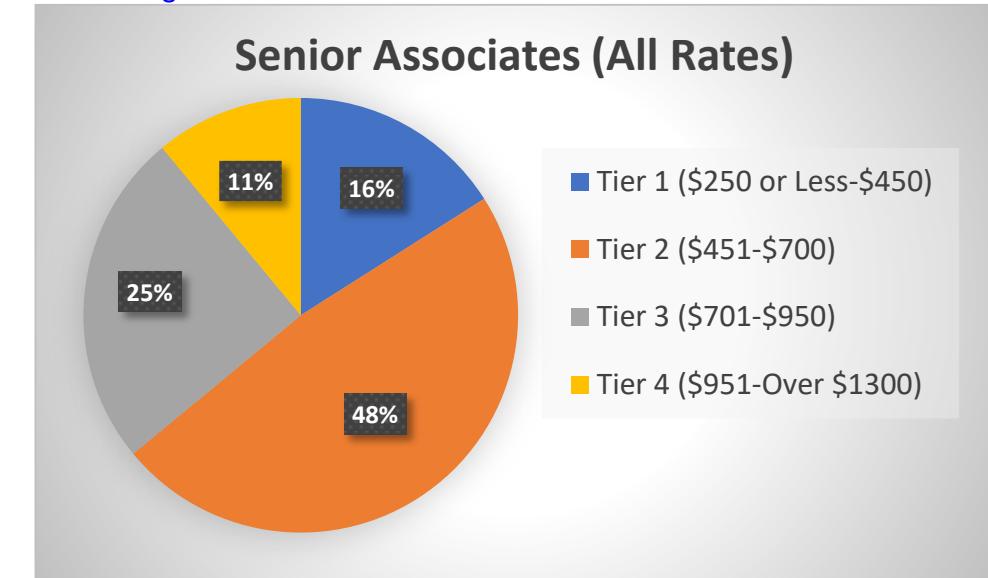


Position Title / Role

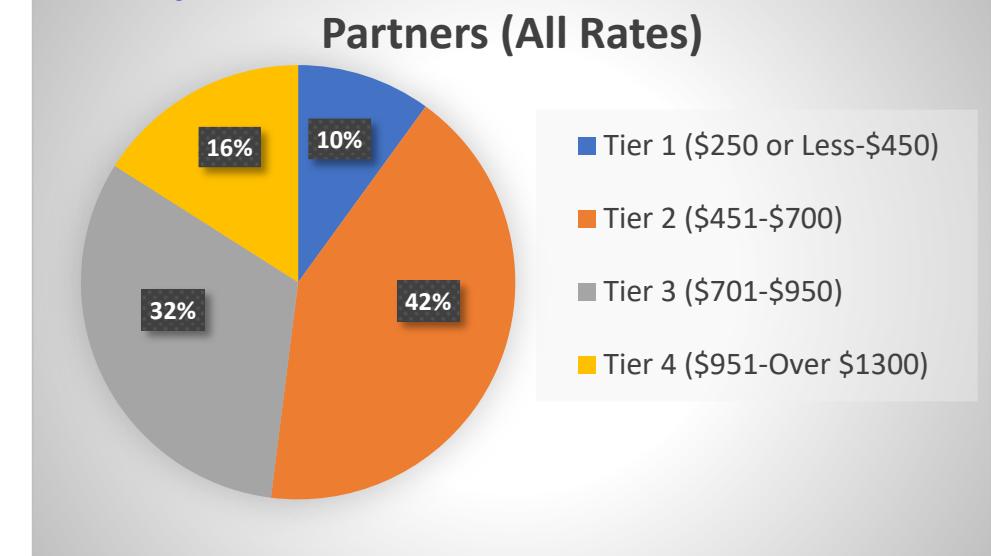
2023 Rate Data from Associates												
			Defense				Plaintiff			Totals		
			Regular Rate		Complex Rate		Regular Rate		Complex Rate		All Rates	
	Rate Tier	Rate Range	#	%	#	%	#	%	#	%	#	%
1	Tier 1	\$250 or Less	66	2.33%	66	2.33%	51	1.60%	40	1.25%	223	1.85%
2	Tier 1	\$251-\$300	84	2.97%	84	2.97%	88	2.76%	96	3.01%	352	2.93%
3	Tier 1	\$301-\$350	113	4.00%	113	4.00%	143	4.48%	151	4.74%	520	4.32%
4	Tier 1	\$351-\$400	189	6.69%	189	6.69%	191	5.99%	142	4.45%	711	5.91%
5	Tier 1	\$401-\$450	281	9.94%	281	9.94%	321	10.07%	302	9.47%	1185	9.85%
Sub Totals			733	25.93%	733	25.93%	794	24.90%	731	22.92%	2991	24.86%
6	Tier 2	\$451-\$500	401	14.18%	401	14.18%	493	15.46%	392	12.29%	1687	14.02%
7	Tier 2	\$501-\$550	345	12.20%	345	12.20%	375	11.76%	366	11.48%	1431	11.89%
8	Tier 2	\$551-\$600	295	10.44%	295	10.44%	338	10.60%	316	9.91%	1244	10.34%
9	Tier 2	\$601-\$650	290	10.26%	290	10.26%	224	7.02%	258	8.09%	1062	8.83%
10	Tier 2	\$651-\$700	111	3.93%	111	3.93%	130	4.08%	217	6.80%	569	4.73%
Sub Totals			1442	51.01%	1442	51.01%	1560	48.92%	1549	48.57%	5993	49.81%
11	Tier 3	\$701-\$750	132	4.67%	132	4.67%	156	4.89%	152	4.77%	572	4.75%
12	Tier 3	\$751-\$800	112	3.96%	112	3.96%	143	4.48%	137	4.30%	504	4.19%
13	Tier 3	\$801-\$850	101	3.57%	101	3.57%	133	4.17%	146	4.58%	481	4.00%
14	Tier 3	\$851-\$900	105	3.71%	105	3.71%	111	3.48%	137	4.30%	458	3.81%
15	Tier 3	\$901-\$950	60	2.12%	60	2.12%	101	3.17%	111	3.48%	332	2.76%
Sub Totals			510	18.04%	510	18.04%	644	20.19%	683	21.42%	2347	19.51%
16	Tier 4	\$951-\$1000	35	1.24%	35	1.24%	51	1.60%	55	1.72%	176	1.46%
17	Tier 4	\$1001-\$1100	28	0.99%	28	0.99%	44	1.38%	45	1.41%	145	1.21%
18	Tier 4	\$1101-\$1200	33	1.17%	33	1.17%	32	1.00%	51	1.60%	149	1.24%
19	Tier 4	\$1201-\$1300	28	0.99%	28	0.99%	38	1.19%	44	1.38%	138	1.15%
20	Tier 4	Over \$1300	18	0.64%	18	0.64%	26	0.82%	31	0.97%	93	0.77%
Sub Totals			142	5.02%	142	5.02%	191	5.99%	226	7.09%	701	5.83%
Totals			2,827	100%	2,827	100%	3,189	100%	3,189	100%	12,032	100%



2023 Rate Data from Senior Associates												
			Defense		Plaintiff		Totals					
			Rate Tier	Rate Range	Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates	#	%	
1	Tier 1	\$250 or Less	32	1.02%	18	0.57%	12	0.37%	11	0.34%	73	0.57%
2	Tier 1	\$251-\$300	50	1.59%	41	1.31%	36	1.10%	29	0.89%	156	1.22%
3	Tier 1	\$301-\$350	98	3.13%	81	2.58%	71	2.18%	68	2.08%	318	2.48%
4	Tier 1	\$351-\$400	121	3.86%	97	3.09%	88	2.70%	88	2.70%	394	3.08%
5	Tier 1	\$401-\$450	261	8.32%	261	8.32%	313	9.59%	228	6.99%	1063	8.30%
Sub Totals			562	17.92%	498	15.88%	520	15.93%	424	12.99%	2004	15.66%
6	Tier 2	\$451-\$500	380	12.12%	342	10.91%	341	10.45%	381	11.67%	1444	11.28%
7	Tier 2	\$501-\$550	327	10.43%	297	9.47%	301	9.22%	278	8.52%	1203	9.40%
8	Tier 2	\$551-\$600	313	9.98%	312	9.95%	341	10.45%	313	9.59%	1279	9.99%
9	Tier 2	\$601-\$650	316	10.08%	303	9.66%	329	10.08%	314	9.62%	1262	9.86%
10	Tier 2	\$651-\$700	202	6.44%	230	7.33%	221	6.77%	245	7.51%	898	7.02%
Sub Totals			1538	49.04%	1484	47.32%	1533	46.97%	1531	46.91%	6086	47.55%
11	Tier 3	\$701-\$750	184	5.87%	176	5.61%	188	5.76%	194	5.94%	742	5.80%
12	Tier 3	\$751-\$800	150	4.78%	151	4.82%	168	5.15%	170	5.21%	639	4.99%
13	Tier 3	\$801-\$850	144	4.59%	143	4.56%	181	5.55%	180	5.51%	648	5.06%
14	Tier 3	\$851-\$900	151	4.82%	171	5.45%	159	4.87%	181	5.55%	662	5.17%
15	Tier 3	\$901-\$950	124	3.95%	136	4.34%	154	4.72%	158	4.84%	572	4.47%
Sub Totals			753	24.01%	777	24.78%	850	26.04%	883	27.05%	3263	25.49%
16	Tier 4	\$951-\$1000	67	2.14%	95	3.03%	84	2.57%	95	2.91%	341	2.66%
17	Tier 4	\$1001-\$1100	57	1.82%	85	2.71%	67	2.05%	90	2.76%	299	2.34%
18	Tier 4	\$1101-\$1200	55	1.75%	65	2.07%	72	2.21%	81	2.48%	273	2.13%
19	Tier 4	\$1201-\$1300	61	1.95%	77	2.46%	72	2.21%	86	2.63%	296	2.31%
20	Tier 4	Over \$1300	43	1.37%	55	1.75%	66	2.02%	74	2.27%	238	1.86%
Sub Totals			283	9.02%	377	12.02%	361	11.06%	426	13.05%	1447	11.30%
Totals			3,136	100%	3,136	100%	3,264	100%	3,264	100%	12,800	100%

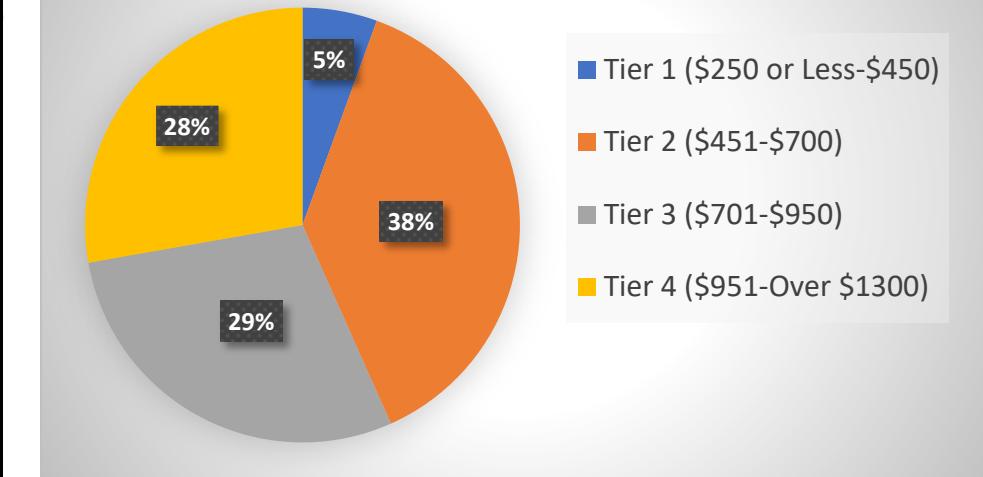


2023 Rate Data from Partners											
			Defense		Plaintiff		Totals				
			Rate Tier	Rate Range	Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates		
				#	%	#	%	#	%	#	%
1	Tier 1	\$250 or Less		7	0.21%	5	0.15%	6	0.19%	8	0.26%
2	Tier 1	\$251-\$300		12	0.36%	9	0.27%	6	0.19%	9	0.29%
3	Tier 1	\$301-\$350		41	1.22%	31	0.92%	12	0.39%	14	0.45%
4	Tier 1	\$351-\$400		74	2.20%	67	1.99%	68	2.19%	55	1.77%
5	Tier 1	\$401-\$450		234	6.94%	223	6.62%	247	7.94%	190	6.11%
Sub Totals				368	10.92%	335	9.94%	339	10.90%	276	8.87%
6	Tier 2	\$451-\$500		318	9.43%	323	9.58%	274	8.81%	265	8.52%
7	Tier 2	\$501-\$550		316	9.37%	309	9.17%	248	7.97%	247	7.94%
8	Tier 2	\$551-\$600		296	8.78%	270	8.01%	244	7.84%	255	8.20%
9	Tier 2	\$601-\$650		309	9.17%	288	8.54%	250	8.04%	248	7.97%
10	Tier 2	\$651-\$700		243	7.21%	258	7.65%	225	7.23%	219	7.04%
Sub Totals				1482	43.96%	1448	42.95%	1241	39.89%	1234	39.67%
11	Tier 3	\$701-\$750		228	6.76%	232	6.88%	215	6.91%	220	7.07%
12	Tier 3	\$751-\$800		203	6.02%	208	6.17%	216	6.94%	208	6.69%
13	Tier 3	\$801-\$850		211	6.26%	211	6.26%	198	6.36%	211	6.78%
14	Tier 3	\$851-\$900		204	6.05%	209	6.20%	188	6.04%	201	6.46%
15	Tier 3	\$901-\$950		167	4.95%	187	5.55%	183	5.88%	199	6.40%
Sub Totals				1013	30.05%	1047	31.06%	1000	32.14%	1039	33.40%
16	Tier 4	\$951-\$1000		120	3.56%	126	3.74%	116	3.73%	119	3.83%
17	Tier 4	\$1001-\$1100		108	3.20%	108	3.20%	106	3.41%	112	3.60%
18	Tier 4	\$1101-\$1200		88	2.61%	110	3.26%	102	3.28%	116	3.73%
19	Tier 4	\$1201-\$1300		99	2.94%	96	2.85%	106	3.41%	113	3.63%
20	Tier 4	Over \$1300		93	2.76%	101	3.00%	101	3.25%	102	3.28%
Sub Totals				508	15.07%	541	16.05%	531	17.07%	562	18.06%
				2142	16.52%						

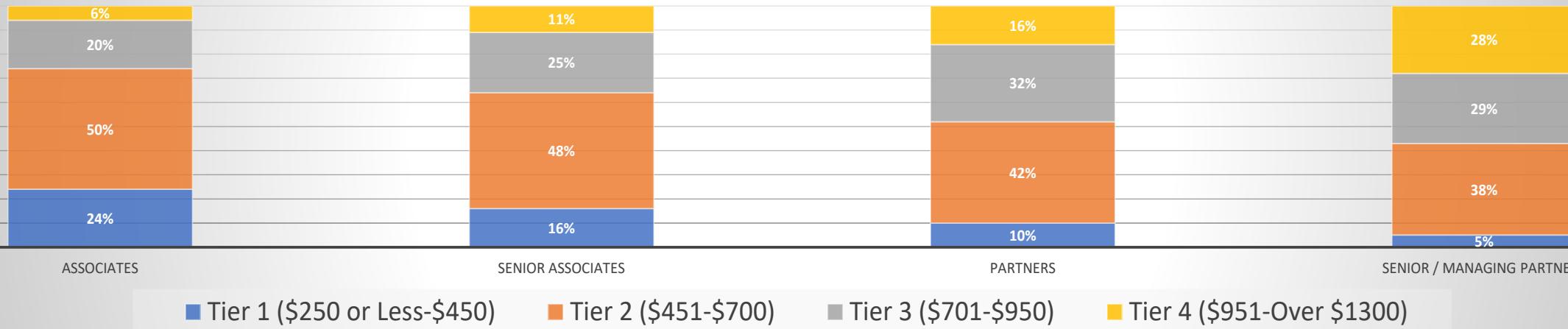


Senior/ Managing Partners (All Rates)

2023 Rate Data from Senior / Managing Partners											
Rate Tier	Rate Range	Defense		Plaintiff		Totals					
		Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates					
		#	%	#	%	#	%	#	%	#	%
1	Tier 1 \$250 or Less	3	0.14%	4	0.18%	2	0.05%	1	0.03%	10	0.08%
2	Tier 1 \$251-\$300	5	0.23%	6	0.28%	3	0.08%	5	0.13%	19	0.16%
3	Tier 1 \$301-\$350	8	0.37%	11	0.51%	3	0.08%	4	0.11%	26	0.22%
4	Tier 1 \$351-\$400	34	1.57%	24	1.11%	9	0.24%	8	0.21%	75	0.63%
5	Tier 1 \$401-\$450	119	5.50%	77	3.56%	167	4.45%	130	3.46%	493	4.16%
Sub Totals		169	7.81%	122	5.64%	184	4.90%	148	3.94%	623	5.26%
6	Tier 2 \$451-\$500	188	8.69%	172	7.95%	278	7.40%	251	6.68%	889	7.51%
7	Tier 2 \$501-\$550	155	7.16%	143	6.61%	245	6.52%	242	6.44%	785	6.63%
8	Tier 2 \$551-\$600	161	7.44%	155	7.16%	256	6.82%	244	6.50%	816	6.89%
9	Tier 2 \$601-\$650	156	7.21%	150	6.93%	255	6.79%	223	5.94%	784	6.62%
10	Tier 2 \$651-\$700	141	6.52%	139	6.42%	244	6.50%	241	6.42%	765	6.46%
Sub Totals		801	37.01%	759	35.07%	1278	34.03%	1201	31.98%	4039	34.12%
11	Tier 3 \$701-\$750	158	7.30%	145	6.70%	282	7.51%	290	7.72%	875	7.39%
12	Tier 3 \$751-\$800	139	6.42%	157	7.26%	271	7.22%	286	7.62%	853	7.21%
13	Tier 3 \$801-\$850	143	6.61%	155	7.16%	269	7.16%	275	7.32%	842	7.11%
14	Tier 3 \$851-\$900	141	6.52%	155	7.16%	268	7.14%	295	7.86%	859	7.26%
15	Tier 3 \$901-\$950	135	6.24%	150	6.93%	263	7.00%	282	7.51%	830	7.01%
Sub Totals		716	33.09%	762	35.21%	1353	36.03%	1428	38.03%	4259	35.98%
16	Tier 4 \$951-\$1000	105	4.85%	110	5.08%	193	5.14%	199	5.30%	607	5.13%
17	Tier 4 \$1001-\$1100	98	4.53%	116	5.36%	182	4.85%	190	5.06%	586	4.95%
18	Tier 4 \$1101-\$1200	92	4.25%	95	4.39%	191	5.09%	200	5.33%	578	4.88%
19	Tier 4 \$1201-\$1300	88	4.07%	99	4.57%	192	5.11%	177	4.71%	556	4.70%
20	Tier 4 Over \$1300	95	4.39%	101	4.67%	182	4.85%	212	5.65%	590	4.98%
Sub Totals		478	22.09%	521	24.08%	940	25.03%	978	26.05%	2917	24.64%
Totals		2,164	100%	2,164	100%	3,755	100%	3,755	100%	11,838	100%



Position / Title by Tier Rate System (2023)

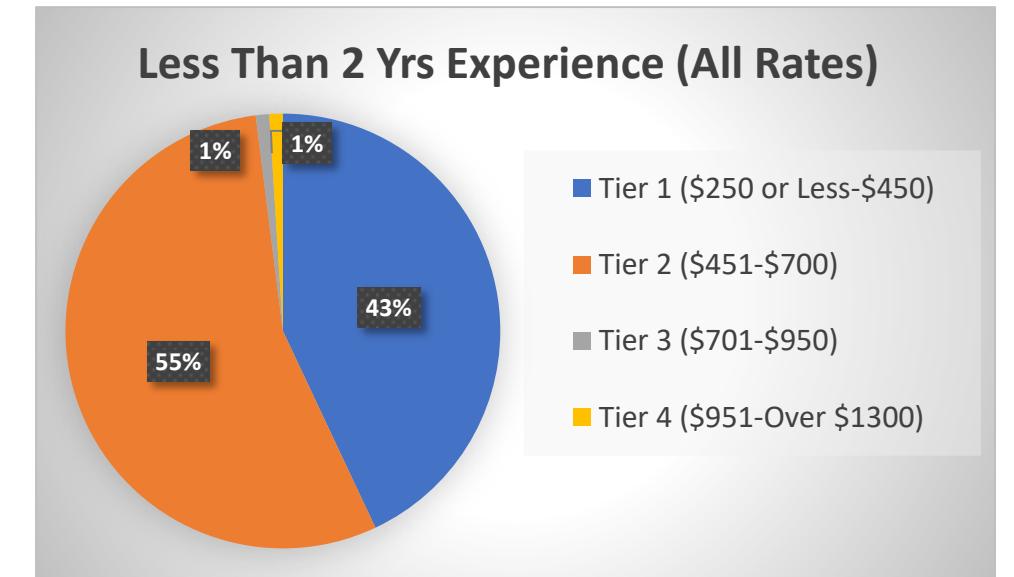


Years of Litigation Experience / Seniority

Less Than 2 Years of Litigation Experience

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2023 Rate Data for Less Than 2 Years of Litigation Experience												
Rate Tier	Rate Range	Defense		Plaintiff		Totals						
		Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates						
		#	%	#	%	#	%	#	%	#	%	
1	Tier 1	\$250 or Less	22	3.45%	17	2.67%	17	2.52%	18	2.67%	74	2.82%
2	Tier 1	\$251-\$300	36	5.65%	38	5.97%	26	3.85%	25	3.70%	125	4.76%
3	Tier 1	\$301-\$350	52	8.16%	47	7.38%	38	5.63%	31	4.59%	168	6.40%
4	Tier 1	\$351-\$400	75	11.77%	84	13.19%	95	14.07%	97	14.37%	351	13.38%
5	Tier 1	\$401-\$450	95	14.91%	80	12.56%	113	16.74%	111	16.44%	399	15.21%
Sub Totals		280	43.96%	266	41.76%	289	42.81%	282	41.78%	1117	42.57%	
6	Tier 2	\$451-\$500	102	16.01%	88	13.81%	111	16.44%	115	17.04%	416	15.85%
7	Tier 2	\$501-\$550	87	13.66%	94	14.76%	103	15.26%	88	13.04%	372	14.18%
8	Tier 2	\$551-\$600	74	11.62%	77	12.09%	62	9.19%	76	11.26%	289	11.01%
9	Tier 2	\$601-\$650	45	7.06%	66	10.36%	65	9.63%	81	12.00%	257	9.79%
10	Tier 2	\$651-\$700	35	5.49%	32	5.02%	31	4.59%	18	2.67%	116	4.42%
Sub Totals		343	53.85%	357	56.04%	372	55.11%	378	56.00%	1450	55.26%	
11	Tier 3	\$701-\$750	5	0.78%	6	0.94%	9	1.33%	9	1.33%	29	1.11%
12	Tier 3	\$751-\$800	1	0.16%	2	0.31%	2	0.30%	1	0.15%	6	0.23%
13	Tier 3	\$801-\$850	2	0.31%	1	0.16%	1	0.15%	1	0.15%	5	0.19%
14	Tier 3	\$851-\$900	1	0.16%	0	0.00%	0	0.00%	1	0.15%	2	0.08%
15	Tier 3	\$901-\$950	0	0.00%	2	0.31%	0	0.00%	0	0.00%	2	0.08%
Sub Totals		9	1.41%	11	1.73%	12	1.78%	12	1.78%	44	1.68%	
16	Tier 4	\$951-\$1000	3	0.47%	2	0.31%	2	0.30%	2	0.30%	9	0.34%
17	Tier 4	\$1001-\$1100	2	0.31%	1	0.16%	0	0.00%	1	0.15%	4	0.15%
18	Tier 4	\$1101-\$1200	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
19	Tier 4	\$1201-\$1300	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
20	Tier 4	Over \$1300	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Sub Totals		5	0.78%	3	0.47%	2	0.30%	3	0.44%	13	0.50%	
Totals		637	100%	637	100%	675	100%	675	100%	2624	100%	



2-3 Years of Litigation Experience

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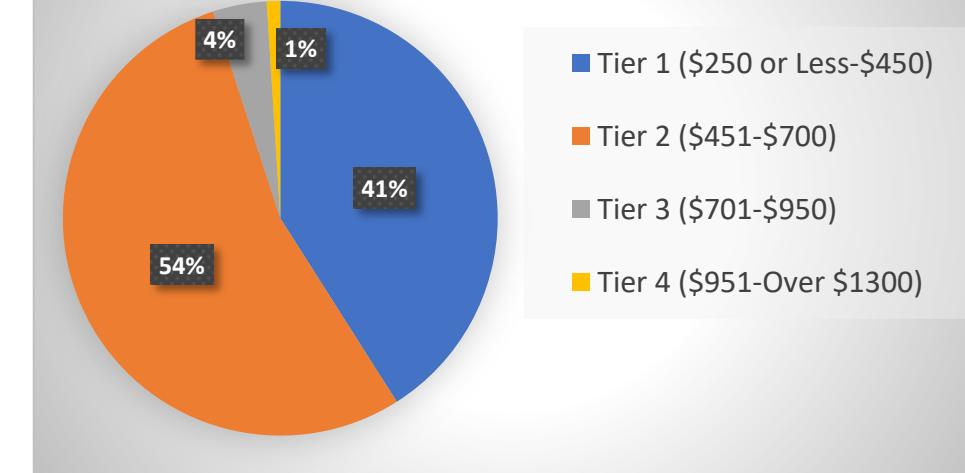
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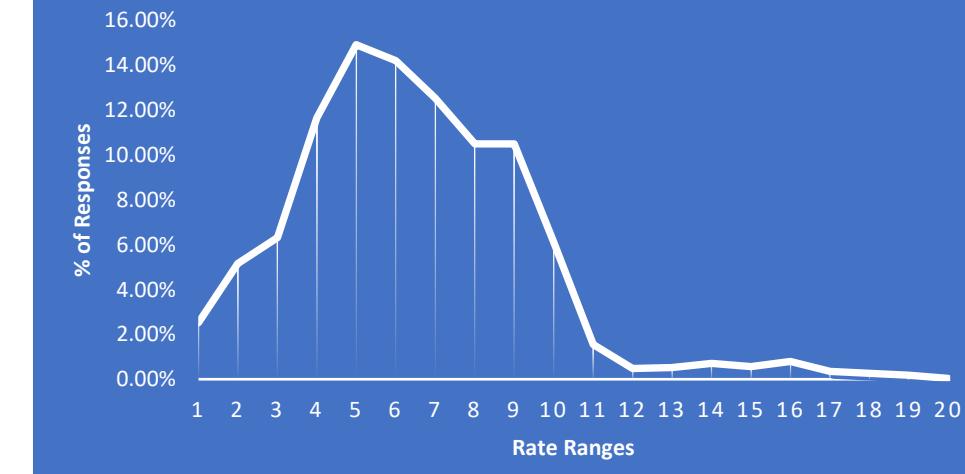
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2023 Rate Data for 2-3 Years of Litigation Experience											
			Defense		Plaintiff		Totals				
			Rate Tier	Rate Range	Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates	#	%
1	Tier 1	\$250 or Less			18	3.43%	15	2.86%		12	1.98%
2	Tier 1	\$251-\$300			30	5.71%	33	6.29%		26	4.28%
3	Tier 1	\$301-\$350			31	5.90%	31	5.90%		34	5.60%
4	Tier 1	\$351-\$400			66	12.57%	61	11.62%		77	12.69%
5	Tier 1	\$401-\$450			81	15.43%	71	13.52%		91	14.99%
Sub Totals					226	43.05%	211	40.19%		240	39.54%
6	Tier 2	\$451-\$500			64	12.19%	70	13.33%		96	15.82%
7	Tier 2	\$501-\$550			71	13.52%	63	12.00%		75	12.36%
8	Tier 2	\$551-\$600			51	9.71%	59	11.24%		65	10.71%
9	Tier 2	\$601-\$650			58	11.05%	60	11.43%		55	9.06%
10	Tier 2	\$651-\$700			45	8.57%	42	8.00%		31	5.11%
Sub Totals					289	55.05%	294	56.00%		322	53.05%
11	Tier 3	\$701-\$750			4	0.76%	7	1.33%		15	2.47%
12	Tier 3	\$751-\$800			0	0.00%	1	0.19%		4	0.66%
13	Tier 3	\$801-\$850			1	0.19%	3	0.57%		3	0.49%
14	Tier 3	\$851-\$900			1	0.19%	3	0.57%		6	0.99%
15	Tier 3	\$901-\$950			0	0.00%	2	0.38%		7	1.15%
Sub Totals					6	1.14%	16	3.05%		35	5.77%
16	Tier 4	\$951-\$1000			3	0.57%	2	0.38%		5	0.82%
17	Tier 4	\$1001-\$1100			1	0.19%	1	0.19%		1	0.16%
18	Tier 4	\$1101-\$1200			0	0.00%	0	0.00%		2	0.33%
19	Tier 4	\$1201-\$1300			0	0.00%	1	0.19%		2	0.33%
20	Tier 4	Over \$1300			0	0.00%	0	0.00%		0	0.00%
Sub Totals					4	0.76%	4	0.76%		10	1.65%
Totals					525	100%	525	100%		607	100%
					607	100%	607	100%		2264	100%

2-3 Years of Experience (All Rates)



2-3 YEARS EXPERIENCE (ALL RATES)



4-5 Years of Litigation Experience

Case 2:19-cv-00069-CCW

Document 346-1

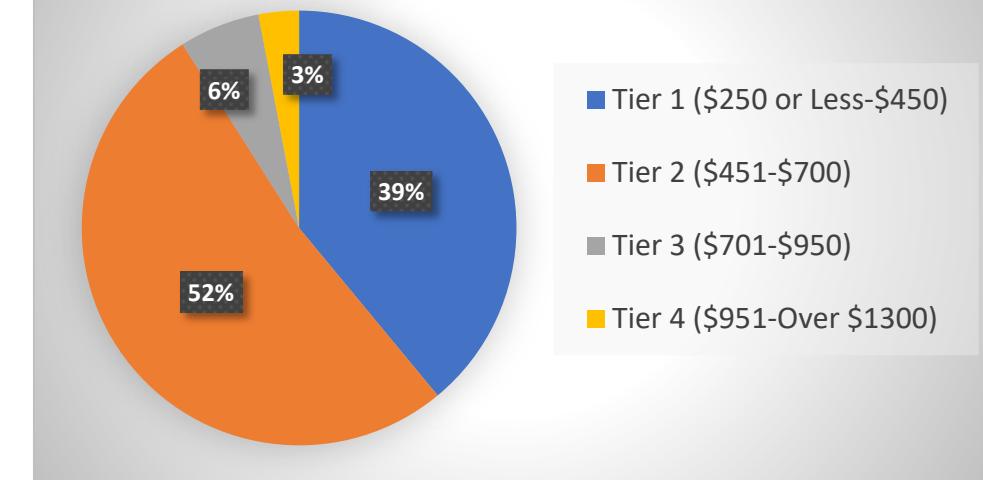
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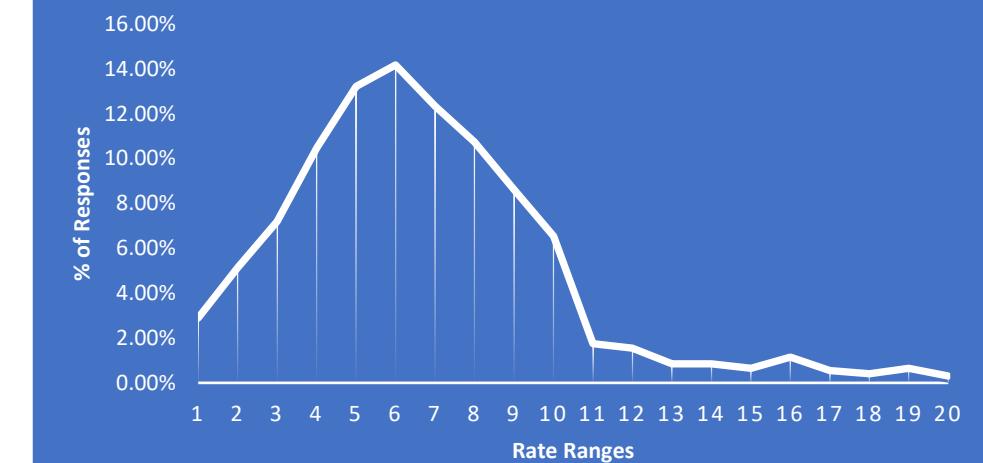
2023 Rate Data for 4-5 Years of Litigation Experience

Rate Tier	Rate Range	Defense		Plaintiff		Totals		
		Regular Rate		Complex Rate		Regular Rate		
		#	%	#	%	#	%	
1	Tier 1	\$250 or Less	20	4.34%	18	3.90%	11	2.03%
2	Tier 1	\$251-\$300	31	6.72%	24	5.21%	23	4.25%
3	Tier 1	\$301-\$350	32	6.94%	33	7.16%	41	7.58%
4	Tier 1	\$351-\$400	49	10.63%	41	8.89%	55	10.17%
5	Tier 1	\$401-\$450	62	13.45%	59	12.80%	76	14.05%
Sub Totals		194	42.08%	175	37.96%	206	38.08%	
6	Tier 2	\$451-\$500	73	15.84%	67	14.53%	63	11.65%
7	Tier 2	\$501-\$550	68	14.75%	60	13.02%	54	9.98%
8	Tier 2	\$551-\$600	58	12.58%	51	11.06%	59	10.91%
9	Tier 2	\$601-\$650	32	6.94%	48	10.41%	55	10.17%
10	Tier 2	\$651-\$700	23	4.99%	29	6.29%	45	8.32%
Sub Totals		254	55.10%	255	55.31%	276	51.02%	
11	Tier 3	\$701-\$750	3	0.65%	7	1.52%	12	2.22%
12	Tier 3	\$751-\$800	1	0.22%	5	1.08%	15	2.77%
13	Tier 3	\$801-\$850	3	0.65%	2	0.43%	6	1.11%
14	Tier 3	\$851-\$900	1	0.22%	5	1.08%	2	0.37%
15	Tier 3	\$901-\$950	1	0.22%	4	0.87%	3	0.55%
Sub Totals		9	1.95%	23	4.99%	38	7.02%	
16	Tier 4	\$951-\$1000	2	0.43%	2	0.43%	8	1.48%
17	Tier 4	\$1001-\$1100	1	0.22%	2	0.43%	4	0.74%
18	Tier 4	\$1101-\$1200	0	0.00%	1	0.22%	4	0.74%
19	Tier 4	\$1201-\$1300	1	0.22%	2	0.43%	3	0.55%
20	Tier 4	Over \$1300	0	0.00%	1	0.22%	2	0.37%
Sub Totals		4	0.87%	8	1.74%	21	3.88%	
Totals		461	100%	461	100%	541	100%	

4-5 Years of Experience (All Rates)



4-5 YEARS OF EXPERIENCE (ALL RATES)



6-7 Years of Litigation Experience

Case 2:19-cv-00069-CCW

Document 346-1

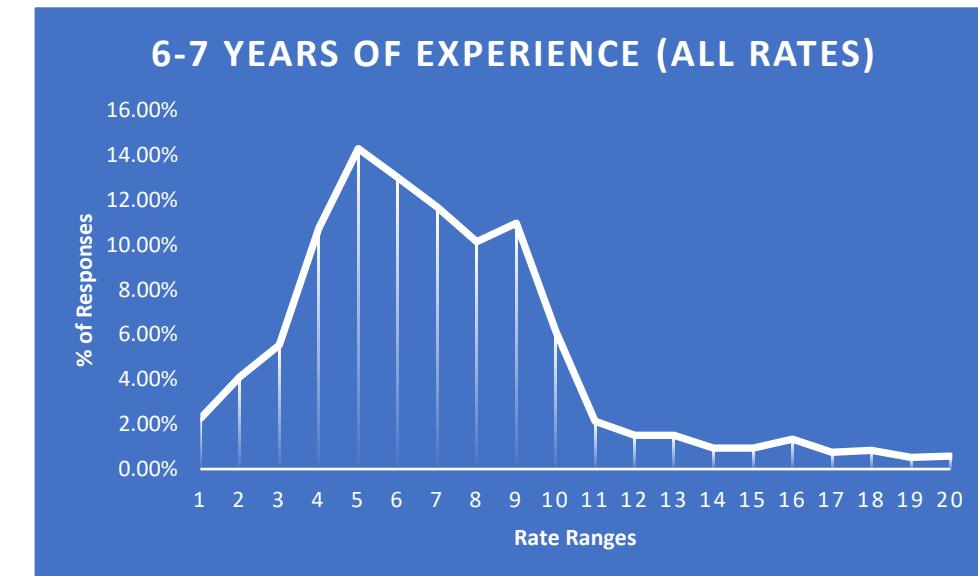
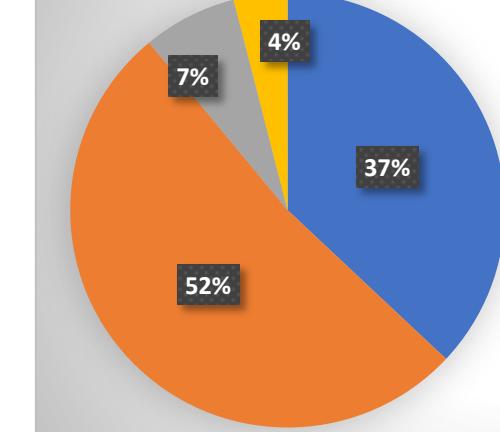
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2023 Rate Data for 6-7 Years of Litigation Experience

Rate Tier	Rate Range	Defense		Plaintiff		Totals	
		Regular Rate		Complex Rate		Regular Rate	
		#	%	#	%	#	%
1	Tier 1 \$250 or Less	15	3.00%	11	2.20%	13	2.07%
2	Tier 1 \$251-\$300	23	4.60%	21	4.20%	21	3.34%
3	Tier 1 \$301-\$350	36	7.20%	31	6.20%	25	3.97%
4	Tier 1 \$351-\$400	59	11.80%	43	8.60%	71	11.29%
5	Tier 1 \$401-\$450	72	14.40%	74	14.80%	96	15.26%
Sub Totals		205	41.00%	180	36.00%	226	35.93%
6	Tier 2 \$451-\$500	66	13.20%	68	13.60%	85	13.51%
7	Tier 2 \$501-\$550	61	12.20%	70	14.00%	73	11.61%
8	Tier 2 \$551-\$600	55	11.00%	49	9.80%	61	9.70%
9	Tier 2 \$601-\$650	57	11.40%	51	10.20%	69	10.97%
10	Tier 2 \$651-\$700	36	7.20%	32	6.40%	39	6.20%
Sub Totals		275	55.00%	270	54.00%	327	51.99%
11	Tier 3 \$701-\$750	2	0.40%	11	2.20%	19	3.02%
12	Tier 3 \$751-\$800	2	0.40%	6	1.20%	18	2.86%
13	Tier 3 \$801-\$850	4	0.80%	8	1.60%	11	1.75%
14	Tier 3 \$851-\$900	2	0.40%	4	0.80%	4	0.64%
15	Tier 3 \$901-\$950	2	0.40%	5	1.00%	5	0.79%
Sub Totals		12	2.40%	34	6.80%	57	9.06%
16	Tier 4 \$951-\$1000	2	0.40%	5	1.00%	6	0.95%
17	Tier 4 \$1001-\$1100	1	0.20%	3	0.60%	1	0.16%
18	Tier 4 \$1101-\$1200	2	0.40%	2	0.40%	5	0.79%
19	Tier 4 \$1201-\$1300	1	0.20%	3	0.60%	4	0.64%
20	Tier 4 Over \$1300	2	0.40%	3	0.60%	3	0.48%
Sub Totals		8	1.60%	16	3.20%	19	3.02%
Totals		500	100%	500	100%	629	100%
						629	100%
						2258	100%

6-7 Years of Experience (All Rates)



8-9 Years of Litigation Experience

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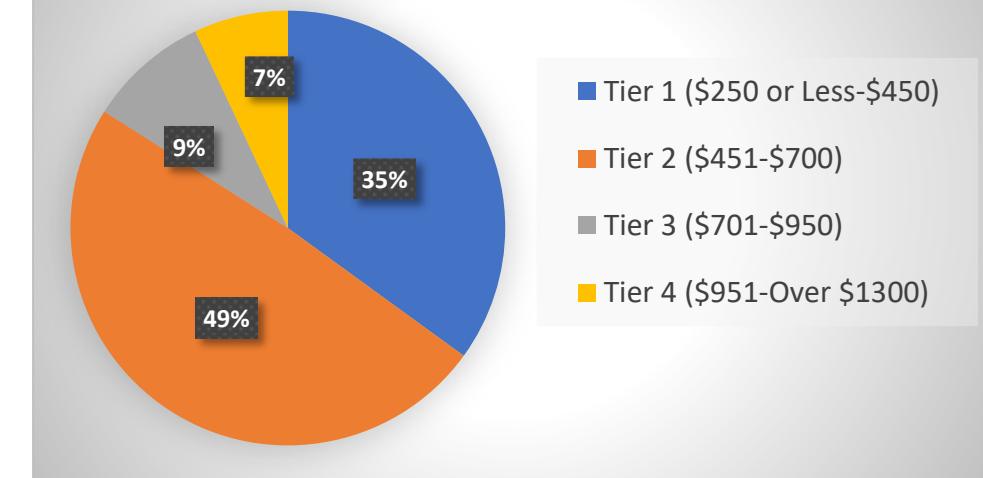
Document 346-1

Filed 01/09/25

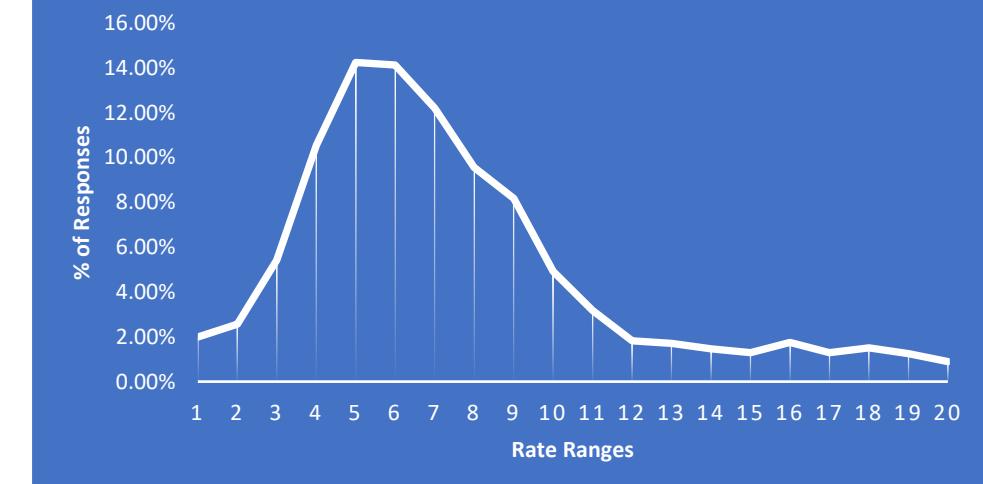
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2023 Rate Data for 8-9 Years of Litigation Experience												
	Rate Tier	Rate Range	Defense		Plaintiff		Totals					
			Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates					
1	Tier 1	\$250 or Less	11	2.02%	12	2.21%	15	2.19%	11	1.61%	49	2.00%
2	Tier 1	\$251-\$300	16	2.94%	17	3.13%	17	2.49%	13	1.90%	63	2.57%
3	Tier 1	\$301-\$350	35	6.43%	29	5.33%	31	4.53%	38	5.56%	133	5.42%
4	Tier 1	\$351-\$400	63	11.58%	56	10.29%	75	10.96%	65	9.50%	259	10.55%
5	Tier 1	\$401-\$450	93	17.10%	71	13.05%	94	13.74%	92	13.45%	350	14.25%
Sub Totals			218	40.07%	185	34.01%	232	33.92%	219	32.02%	854	34.77%
6	Tier 2	\$451-\$500	79	14.52%	69	12.68%	88	12.87%	111	16.23%	347	14.13%
7	Tier 2	\$501-\$550	58	10.66%	68	12.50%	78	11.40%	96	14.04%	300	12.21%
8	Tier 2	\$551-\$600	58	10.66%	62	11.40%	44	6.43%	71	10.38%	235	9.57%
9	Tier 2	\$601-\$650	62	11.40%	46	8.46%	62	9.06%	31	4.53%	201	8.18%
10	Tier 2	\$651-\$700	31	5.70%	32	5.88%	39	5.70%	19	2.78%	121	4.93%
Sub Totals			288	52.94%	277	50.92%	311	45.47%	328	47.95%	1204	49.02%
11	Tier 3	\$701-\$750	9	1.65%	15	2.76%	32	4.68%	22	3.22%	78	3.18%
12	Tier 3	\$751-\$800	5	0.92%	11	2.02%	16	2.34%	13	1.90%	45	1.83%
13	Tier 3	\$801-\$850	4	0.74%	9	1.65%	12	1.75%	17	2.49%	42	1.71%
14	Tier 3	\$851-\$900	1	0.18%	11	2.02%	12	1.75%	12	1.75%	36	1.47%
15	Tier 3	\$901-\$950	3	0.55%	8	1.47%	10	1.46%	11	1.61%	32	1.30%
Sub Totals			22	4.04%	54	9.93%	82	11.99%	75	10.96%	233	9.49%
16	Tier 4	\$951-\$1000	5	0.92%	7	1.29%	17	2.49%	14	2.05%	43	1.75%
17	Tier 4	\$1001-\$1100	3	0.55%	4	0.74%	13	1.90%	12	1.75%	32	1.30%
18	Tier 4	\$1101-\$1200	4	0.74%	6	1.10%	12	1.75%	15	2.19%	37	1.51%
19	Tier 4	\$1201-\$1300	2	0.37%	5	0.92%	12	1.75%	12	1.75%	31	1.26%
20	Tier 4	Over \$1300	2	0.37%	6	1.10%	5	0.73%	9	1.32%	22	0.90%
Sub Totals			16	2.94%	28	5.15%	59	8.63%	62	9.06%	165	6.72%
Totals			544	100%	544	100%	684	100%	684	100%	2456	100%

8-9 Years of Experience (All Rates)



8-9 YEARS OF EXPERIENCE (ALL RATES)



10-11 Years of Litigation Experience

Case 2:19-cv-00069-CGW

Document 346-1

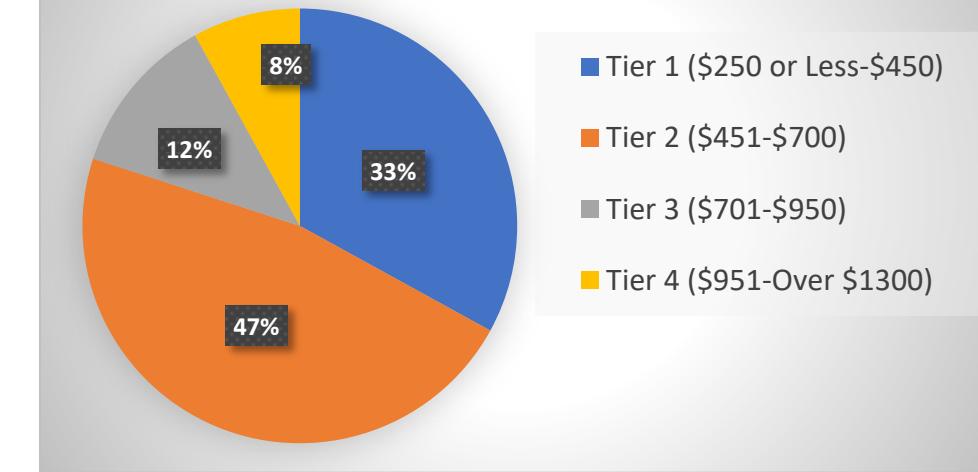
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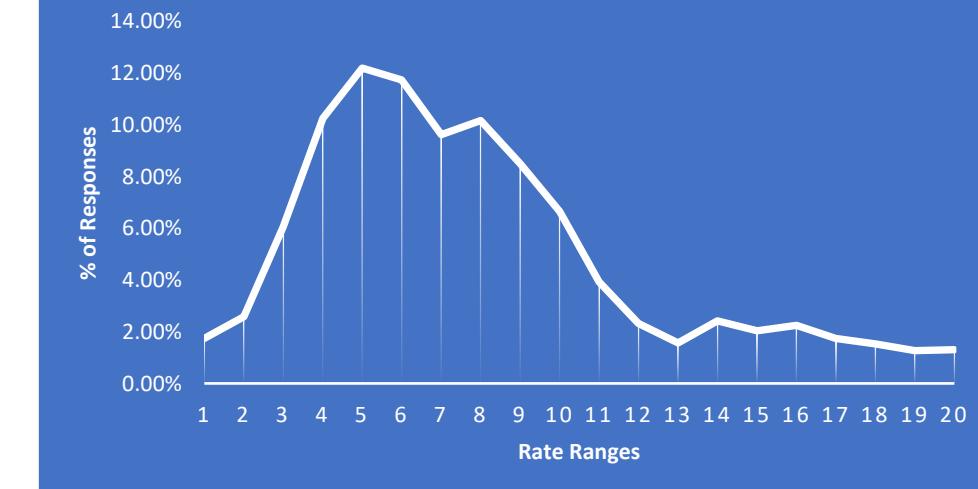
2023 Rate Data for 10-11 Years of Litigation Experience

Rate Tier	Rate Range	Defense		Plaintiff		Totals	
		Regular Rate	Complex Rate	Regular Rate	Complex Rate	Regular Rate	Complex Rate
		#	%	#	%	#	%
1	Tier 1 \$250 or Less	9	1.58%	9	1.58%	14	2.29%
2	Tier 1 \$251-\$300	15	2.64%	16	2.82%	22	3.60%
3	Tier 1 \$301-\$350	50	8.80%	38	6.69%	33	5.40%
4	Tier 1 \$351-\$400	67	11.80%	53	9.33%	54	8.84%
5	Tier 1 \$401-\$450	75	13.20%	71	12.50%	66	10.80%
Sub Totals		216	38.03%	187	32.92%	189	30.93%
6	Tier 2 \$451-\$500	67	11.80%	71	12.50%	64	10.47%
7	Tier 2 \$501-\$550	51	8.98%	51	8.98%	67	10.97%
8	Tier 2 \$551-\$600	59	10.39%	51	8.98%	61	9.98%
9	Tier 2 \$601-\$650	61	10.74%	44	7.75%	56	9.17%
10	Tier 2 \$651-\$700	52	9.15%	39	6.87%	33	5.40%
Sub Totals		290	51.06%	256	45.07%	281	45.99%
11	Tier 3 \$701-\$750	12	2.11%	22	3.87%	28	4.58%
12	Tier 3 \$751-\$800	6	1.06%	17	2.99%	18	2.95%
13	Tier 3 \$801-\$850	4	0.70%	11	1.94%	12	1.96%
14	Tier 3 \$851-\$900	7	1.23%	17	2.99%	20	3.27%
15	Tier 3 \$901-\$950	5	0.88%	18	3.17%	14	2.29%
Sub Totals		34	5.99%	85	14.96%	92	15.06%
16	Tier 4 \$951-\$1000	7	1.23%	11	1.94%	13	2.13%
17	Tier 4 \$1001-\$1100	6	1.06%	8	1.41%	10	1.64%
18	Tier 4 \$1101-\$1200	4	0.70%	8	1.41%	9	1.47%
19	Tier 4 \$1201-\$1300	6	1.06%	6	1.06%	9	1.47%
20	Tier 4 Over \$1300	5	0.88%	7	1.23%	8	1.31%
Sub Totals		28	4.93%	40	7.04%	49	8.02%
Totals		568	100%	568	100%	611	100%
						611	100%
						2358	100%

10-11 Years of Experience (All Rates)



10-11 YEARS OF EXPERIENCE (ALL RATES)



12-13 Years of Litigation Experience

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Document 346-1

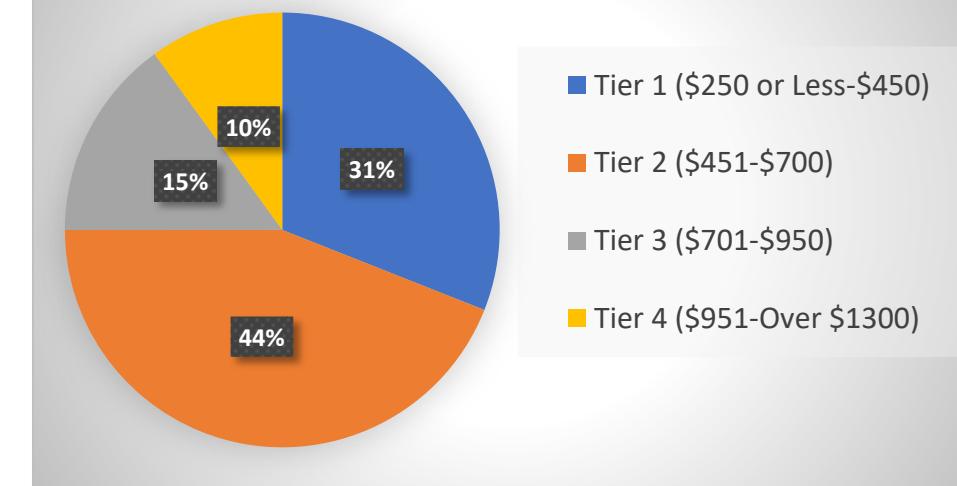
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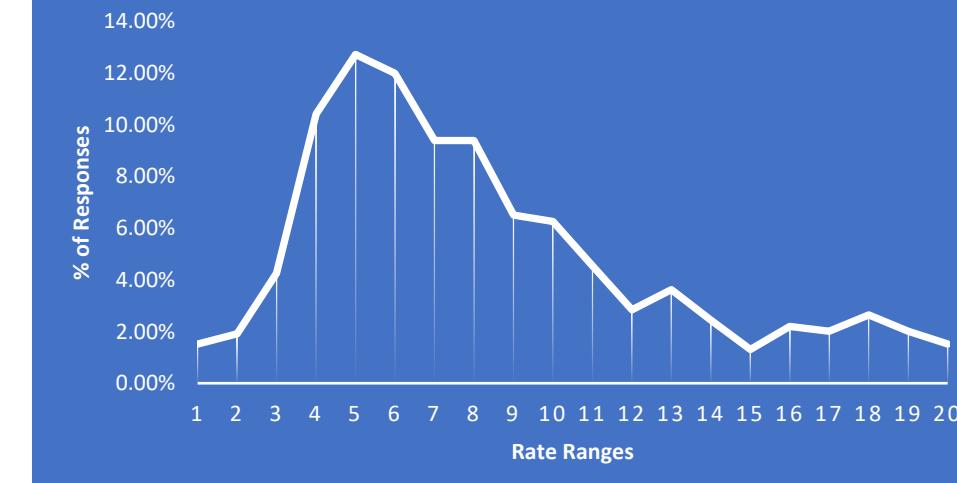
2023 Rate Data for 12-13 Years of Litigation Experience

Rate Tier	Rate Range	Defense		Plaintiff		Totals					
		Regular Rate		Complex Rate		Regular Rate		Complex Rate			
		#	%	#	%	#	%	#	%		
1	Tier 1 \$250 or Less	8	1.71%	8	1.71%	8	1.44%	7	1.26%	31	1.52%
2	Tier 1 \$251-\$300	9	1.93%	12	2.57%	12	2.16%	6	1.08%	39	1.91%
3	Tier 1 \$301-\$350	23	4.93%	18	3.85%	23	4.14%	23	4.14%	87	4.26%
4	Tier 1 \$351-\$400	55	11.78%	46	9.85%	56	10.09%	56	10.09%	213	10.42%
5	Tier 1 \$401-\$450	78	16.70%	56	11.99%	79	14.23%	47	8.47%	260	12.72%
Sub Totals		173	37.04%	140	29.98%	178	32.07%	139	25.05%	630	30.82%
6	Tier 2 \$451-\$500	73	15.63%	55	11.78%	67	12.07%	50	9.01%	245	11.99%
7	Tier 2 \$501-\$550	58	12.42%	39	8.35%	39	7.03%	56	10.09%	192	9.39%
8	Tier 2 \$551-\$600	55	11.78%	44	9.42%	45	8.11%	48	8.65%	192	9.39%
9	Tier 2 \$601-\$650	18	3.85%	35	7.49%	29	5.23%	51	9.19%	133	6.51%
10	Tier 2 \$651-\$700	20	4.28%	32	6.85%	31	5.59%	45	8.11%	128	6.26%
Sub Totals		224	47.97%	205	43.90%	211	38.02%	250	45.05%	890	43.54%
11	Tier 3 \$701-\$750	6	1.28%	18	3.85%	36	6.49%	33	5.95%	93	4.55%
12	Tier 3 \$751-\$800	7	1.50%	16	3.43%	21	3.78%	14	2.52%	58	2.84%
13	Tier 3 \$801-\$850	12	2.57%	18	3.85%	33	5.95%	11	1.98%	74	3.62%
14	Tier 3 \$851-\$900	7	1.50%	16	3.43%	10	1.80%	17	3.06%	50	2.45%
15	Tier 3 \$901-\$950	5	1.07%	11	2.36%	11	1.98%	10	1.80%	37	1.81%
Sub Totals		37	7.92%	79	16.92%	111	20.00%	85	15.32%	312	15.26%
16	Tier 4 \$951-\$1000	10	2.14%	6	1.28%	12	2.16%	17	3.06%	45	2.20%
17	Tier 4 \$1001-\$1100	5	1.07%	10	2.14%	10	1.80%	16	2.88%	41	2.01%
18	Tier 4 \$1101-\$1200	7	1.50%	11	2.36%	15	2.70%	21	3.78%	54	2.64%
19	Tier 4 \$1201-\$1300	4	0.86%	9	1.93%	10	1.80%	18	3.24%	41	2.01%
20	Tier 4 Over \$1300	7	1.50%	7	1.50%	8	1.44%	9	1.62%	31	1.52%
Sub Totals		33	7.07%	43	9.21%	55	9.91%	81	14.59%	212	10.37%
Totals		467	100%	467	100%	555	100%	555	100%	2044	100%

12-13 Years of Experience (All Rates)



12-13 YEARS OF EXPERIENCE (ALL RATES)



14-15 Years of Litigation Experience

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Document 346-1

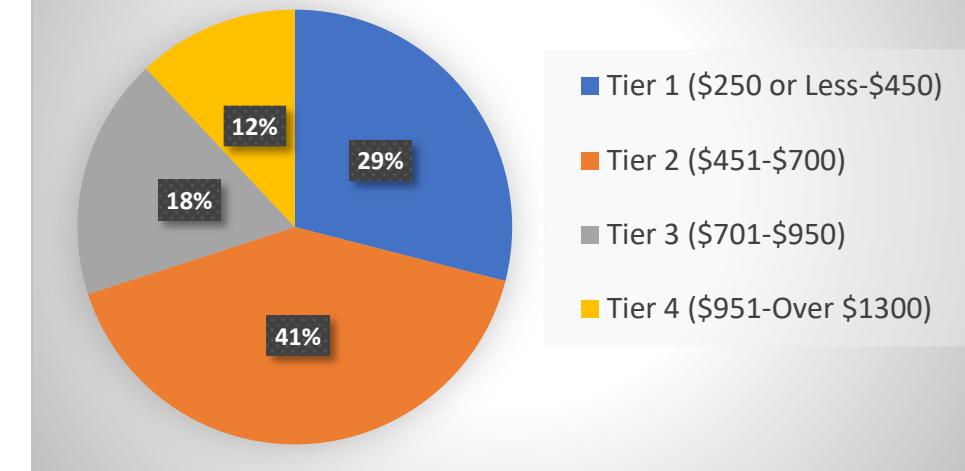
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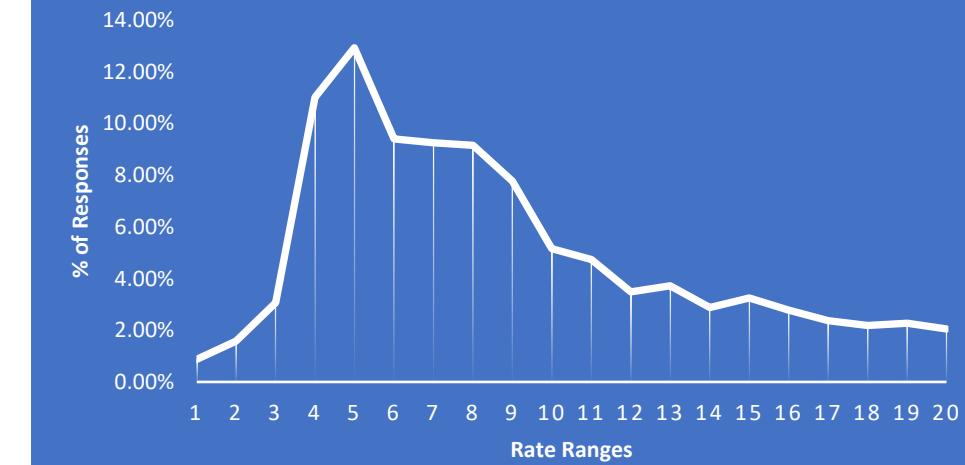
2023 Rate Data for 14-15 Years of Litigation Experience

			Defense		Plaintiff		Totals			
			Rate Tier	Rate Range	Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates	
		#	%	#	%	#	%	#	%	
1	Tier 1	\$250 or Less	6	1.23%	4	0.82%	4	0.68%	19	0.88%
2	Tier 1	\$251-\$300	10	2.04%	9	1.84%	8	1.37%	34	1.58%
3	Tier 1	\$301-\$350	19	3.89%	22	4.50%	10	1.71%	15	2.56%
4	Tier 1	\$351-\$400	65	13.29%	51	10.43%	77	13.14%	44	7.51%
5	Tier 1	\$401-\$450	71	14.52%	66	13.50%	71	12.12%	70	11.95%
Sub Totals			171	34.97%	152	31.08%	170	29.01%	141	24.06%
6	Tier 2	\$451-\$500	55	11.25%	44	9.00%	45	7.68%	58	9.90%
7	Tier 2	\$501-\$550	58	11.86%	39	7.98%	51	8.70%	51	8.70%
8	Tier 2	\$551-\$600	61	12.47%	48	9.82%	42	7.17%	46	7.85%
9	Tier 2	\$601-\$650	35	7.16%	41	8.38%	38	6.48%	53	9.04%
10	Tier 2	\$651-\$700	16	3.27%	24	4.91%	35	5.97%	36	6.14%
Sub Totals			225	46.01%	196	40.08%	211	36.01%	244	41.64%
11	Tier 3	\$701-\$750	15	3.07%	28	5.73%	31	5.29%	28	4.78%
12	Tier 3	\$751-\$800	14	2.86%	12	2.45%	27	4.61%	22	3.75%
13	Tier 3	\$801-\$850	7	1.43%	18	3.68%	32	5.46%	23	3.92%
14	Tier 3	\$851-\$900	4	0.82%	11	2.25%	26	4.44%	21	3.58%
15	Tier 3	\$901-\$950	9	1.84%	19	3.89%	19	3.24%	23	3.92%
Sub Totals			49	10.02%	88	18.00%	135	23.04%	117	19.97%
16	Tier 4	\$951-\$1000	9	1.84%	14	2.86%	17	2.90%	20	3.41%
17	Tier 4	\$1001-\$1100	9	1.84%	11	2.25%	14	2.39%	17	2.90%
18	Tier 4	\$1101-\$1200	8	1.64%	10	2.04%	11	1.88%	18	3.07%
19	Tier 4	\$1201-\$1300	9	1.84%	9	1.84%	14	2.39%	17	2.90%
20	Tier 4	Over \$1300	9	1.84%	9	1.84%	14	2.39%	12	2.05%
Sub Totals			44	9.00%	53	10.84%	70	11.95%	84	14.33%
Totals			489	100%	489	100%	586	100%	2150	100%

14-15 Years of Experience (All Rates)



14-15 YEARS OF EXPERIENCE (ALL RATES)



16-17 Years of Litigation Experience

Case 2:19-cv-00069-CCW

Document 346-1

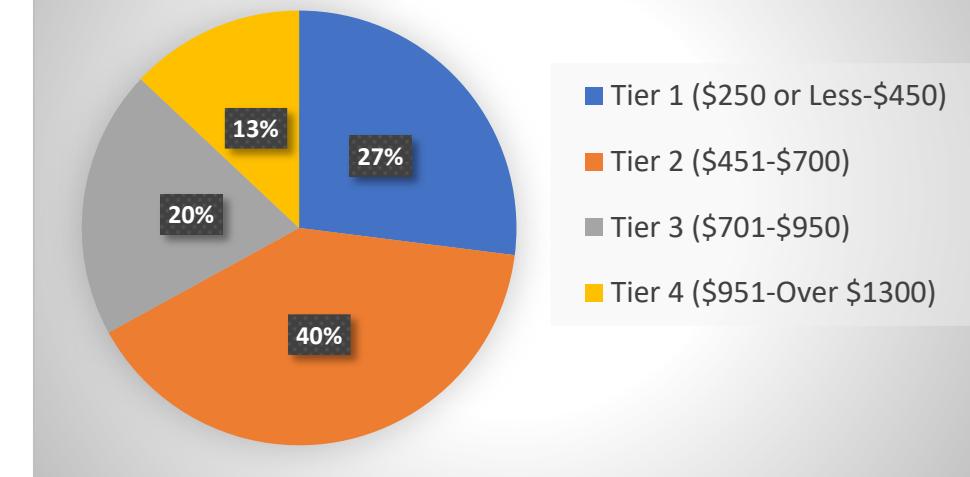
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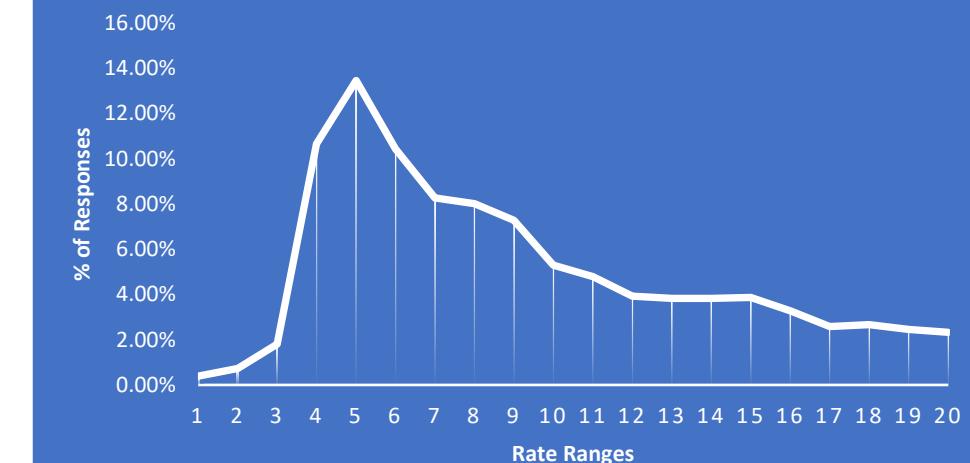
2023 Rate Data for 16-17 Years of Litigation Experience

Rate Tier	Rate Range	Defense		Plaintiff		Totals	
		Regular Rate		Complex Rate		Regular Rate	
		#	%	#	%	#	%
1	Tier 1 \$250 or Less	2	0.38%	2	0.38%	2	0.31%
2	Tier 1 \$251-\$300	3	0.58%	5	0.96%	3	0.47%
3	Tier 1 \$301-\$350	14	2.69%	11	2.11%	6	0.94%
4	Tier 1 \$351-\$400	62	11.90%	51	9.79%	79	12.38%
5	Tier 1 \$401-\$450	89	17.08%	71	13.63%	87	13.64%
Sub Totals		170	32.63%	140	26.87%	177	27.74%
6	Tier 2 \$451-\$500	61	11.71%	60	11.52%	67	10.50%
7	Tier 2 \$501-\$550	55	10.56%	41	7.87%	49	7.68%
8	Tier 2 \$551-\$600	41	7.87%	52	9.98%	43	6.74%
9	Tier 2 \$601-\$650	57	10.94%	35	6.72%	28	4.39%
10	Tier 2 \$651-\$700	20	3.84%	31	5.95%	30	4.70%
Sub Totals		234	44.91%	219	42.03%	217	34.01%
11	Tier 3 \$701-\$750	16	3.07%	25	4.80%	26	4.08%
12	Tier 3 \$751-\$800	11	2.11%	17	3.26%	32	5.02%
13	Tier 3 \$801-\$850	13	2.50%	18	3.45%	29	4.55%
14	Tier 3 \$851-\$900	12	2.30%	20	3.84%	31	4.86%
15	Tier 3 \$901-\$950	11	2.11%	19	3.65%	35	5.49%
Sub Totals		63	12.09%	99	19.00%	153	23.98%
16	Tier 4 \$951-\$1000	13	2.50%	12	2.30%	22	3.45%
17	Tier 4 \$1001-\$1100	11	2.11%	13	2.50%	18	2.82%
18	Tier 4 \$1101-\$1200	9	1.73%	14	2.69%	17	2.66%
19	Tier 4 \$1201-\$1300	11	2.11%	13	2.50%	18	2.82%
20	Tier 4 Over \$1300	10	1.92%	11	2.11%	16	2.51%
Sub Totals		54	10.36%	63	12.09%	91	14.26%
Totals		521	100%	521	100%	638	100%
						638	100%
						2318	100%

16-17 Years of Experience (All Rates)



16-17 YEARS OF EXPERIENCE (ALL RATES)



18-19 Years of Litigation Experience

Case 2:19-cv-00069-CCW

Document 346-1

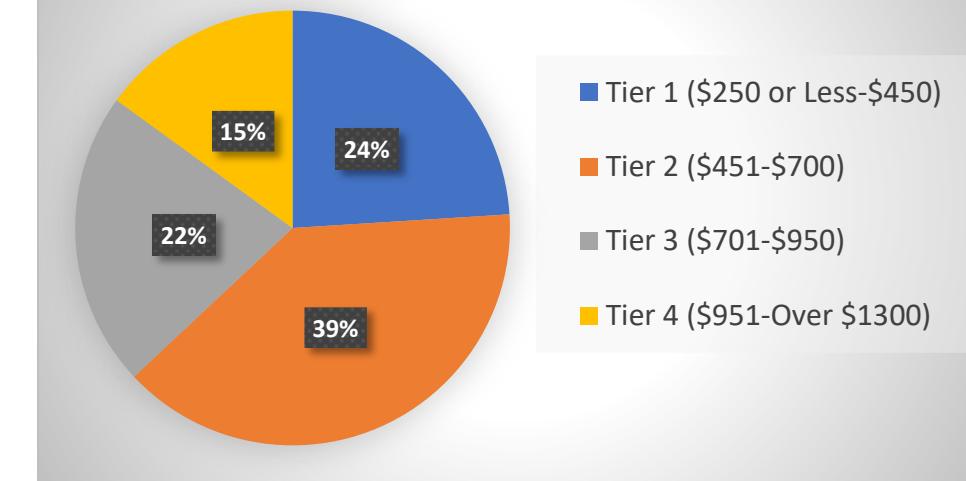
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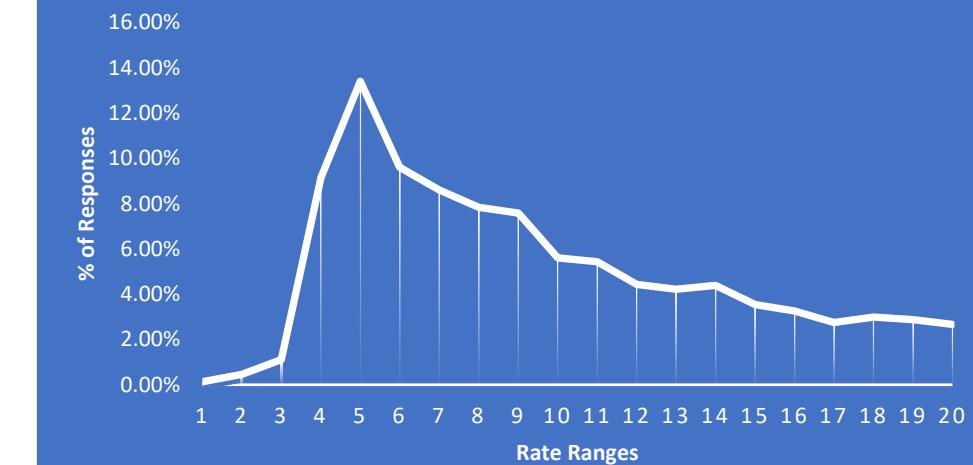
2023 Rate Data for 18-19 Years of Litigation Experience

Rate Tier	Rate Range	Defense		Plaintiff		Totals	
		Regular Rate		Complex Rate		Regular Rate	
		#	%	#	%	#	%
1	Tier 1 \$250 or Less	1	0.19%	1	0.19%	1	0.15%
2	Tier 1 \$251-\$300	4	0.77%	3	0.57%	2	0.30%
3	Tier 1 \$301-\$350	5	0.96%	7	1.34%	5	0.75%
4	Tier 1 \$351-\$400	64	12.26%	43	8.24%	63	9.49%
5	Tier 1 \$401-\$450	81	15.52%	76	14.56%	87	13.10%
Sub Totals		155	29.69%	130	24.90%	158	23.80%
6	Tier 2 \$451-\$500	56	10.73%	55	10.54%	62	9.34%
7	Tier 2 \$501-\$550	58	11.11%	49	9.39%	46	6.93%
8	Tier 2 \$551-\$600	40	7.66%	45	8.62%	51	7.68%
9	Tier 2 \$601-\$650	39	7.47%	43	8.24%	47	7.08%
10	Tier 2 \$651-\$700	32	6.13%	22	4.21%	34	5.12%
Sub Totals		225	43.10%	214	41.00%	240	36.14%
11	Tier 3 \$701-\$750	24	4.60%	26	4.98%	40	6.02%
12	Tier 3 \$751-\$800	15	2.87%	20	3.83%	35	5.27%
13	Tier 3 \$801-\$850	13	2.49%	23	4.41%	31	4.67%
14	Tier 3 \$851-\$900	15	2.87%	19	3.64%	35	5.27%
15	Tier 3 \$901-\$950	11	2.11%	17	3.26%	25	3.77%
Sub Totals		78	14.94%	105	20.11%	166	25.00%
16	Tier 4 \$951-\$1000	13	2.49%	18	3.45%	27	4.07%
17	Tier 4 \$1001-\$1100	15	2.87%	13	2.49%	16	2.41%
18	Tier 4 \$1101-\$1200	13	2.49%	14	2.68%	18	2.71%
19	Tier 4 \$1201-\$1300	13	2.49%	15	2.87%	20	3.01%
20	Tier 4 Over \$1300	10	1.92%	13	2.49%	19	2.86%
Sub Totals		64	12.26%	73	13.98%	100	15.06%
Totals		522	100%	522	100%	664	100%

18-19 Years of Experience (All Rates)



18-19 YEARS OF EXPERIENCE (ALL RATES)



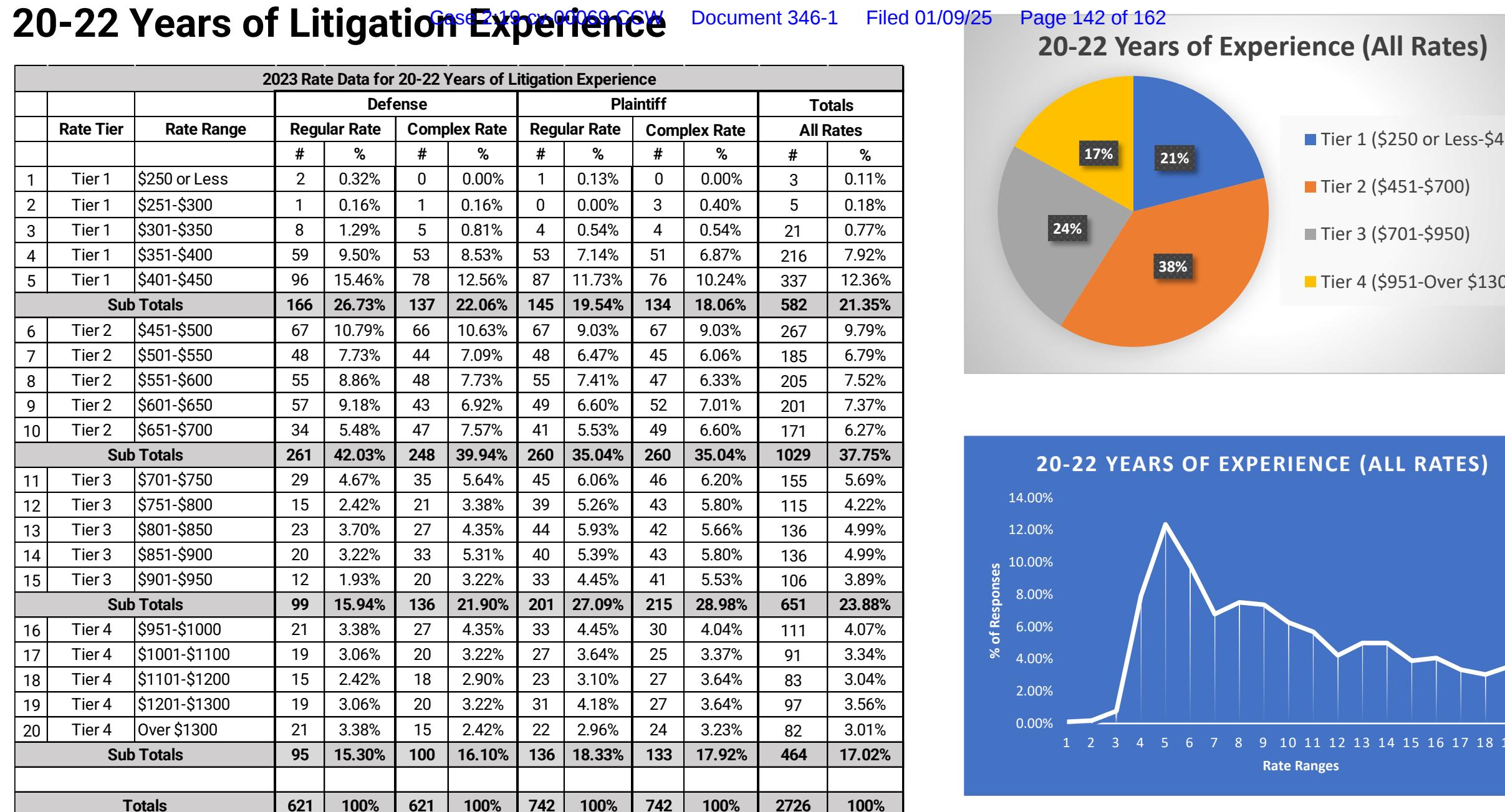
20-22 Years of Litigation Experience

Case 2:19-cv-00069-CGW

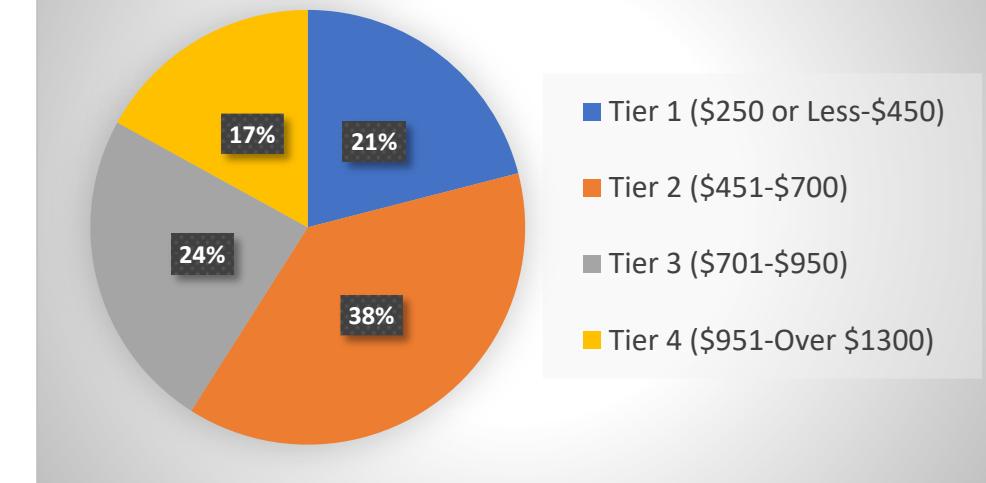
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Filed 01/09/25

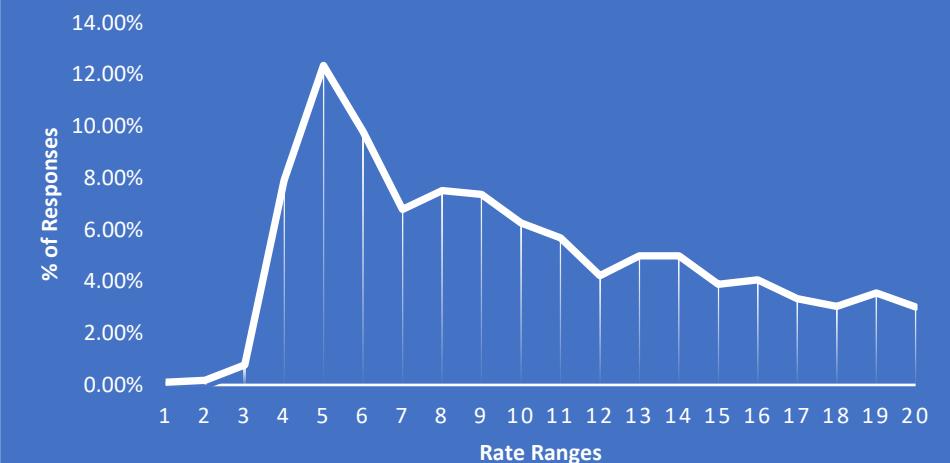
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20-22 Years of Experience (All Rates)



20-22 YEARS OF EXPERIENCE (ALL RATES)



23-25 Years of Litigation Experience

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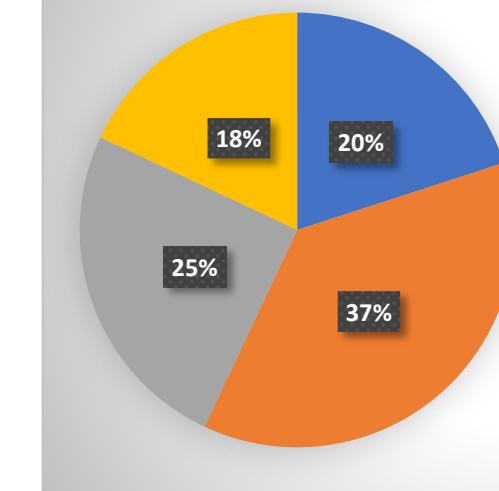
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23-25 Years of Experience (All Rates)

2023 Rate Data for 23-25 Years of Litigation Experience												
	Rate Tier	Rate Range	Defense		Plaintiff		Totals					
			Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates					
			#	%	#	%	#	%	#	%		
1	Tier 1	\$250 or Less	1	0.15%	0	0.00%	0	0.00%	0	0.00%	1	0.04%
2	Tier 1	\$251-\$300	3	0.46%	3	0.46%	0	0.00%	1	0.15%	7	0.26%
3	Tier 1	\$301-\$350	6	0.92%	2	0.31%	5	0.73%	2	0.29%	15	0.56%
4	Tier 1	\$351-\$400	65	10.02%	50	7.70%	35	5.12%	47	6.87%	197	7.39%
5	Tier 1	\$401-\$450	94	14.48%	75	11.56%	90	13.16%	66	9.65%	325	12.19%
Sub Totals			169	26.04%	130	20.03%	130	19.01%	116	16.96%	545	20.44%
6	Tier 2	\$451-\$500	67	10.32%	65	10.02%	59	8.63%	59	8.63%	250	9.38%
7	Tier 2	\$501-\$550	59	9.09%	53	8.17%	41	5.99%	47	6.87%	200	7.50%
8	Tier 2	\$551-\$600	58	8.94%	44	6.78%	48	7.02%	48	7.02%	198	7.43%
9	Tier 2	\$601-\$650	48	7.40%	51	7.86%	44	6.43%	40	5.85%	183	6.86%
10	Tier 2	\$651-\$700	34	5.24%	40	6.16%	40	5.85%	39	5.70%	153	5.74%
Sub Totals			266	40.99%	253	38.98%	232	33.92%	233	34.06%	984	36.91%
11	Tier 3	\$701-\$750	28	4.31%	35	5.39%	44	6.43%	52	7.60%	159	5.96%
12	Tier 3	\$751-\$800	22	3.39%	31	4.78%	38	5.56%	42	6.14%	133	4.99%
13	Tier 3	\$801-\$850	19	2.93%	31	4.78%	43	6.29%	45	6.58%	138	5.18%
14	Tier 3	\$851-\$900	22	3.39%	28	4.31%	38	5.56%	41	5.99%	129	4.84%
15	Tier 3	\$901-\$950	20	3.08%	31	4.78%	29	4.24%	32	4.68%	112	4.20%
Sub Totals			111	17.10%	156	24.04%	192	28.07%	212	30.99%	671	25.17%
16	Tier 4	\$951-\$1000	23	3.54%	26	4.01%	32	4.68%	28	4.09%	109	4.09%
17	Tier 4	\$1001-\$1100	21	3.24%	22	3.39%	26	3.80%	25	3.65%	94	3.53%
18	Tier 4	\$1101-\$1200	18	2.77%	20	3.08%	25	3.65%	21	3.07%	84	3.15%
19	Tier 4	\$1201-\$1300	21	3.24%	22	3.39%	26	3.80%	24	3.51%	93	3.49%
20	Tier 4	Over \$1300	20	3.08%	20	3.08%	21	3.07%	25	3.65%	86	3.23%
Sub Totals			103	15.87%	110	16.95%	130	19.01%	123	17.98%	466	17.48%
Totals			649	100%	649	100%	684	100%	684	100%	2666	100%



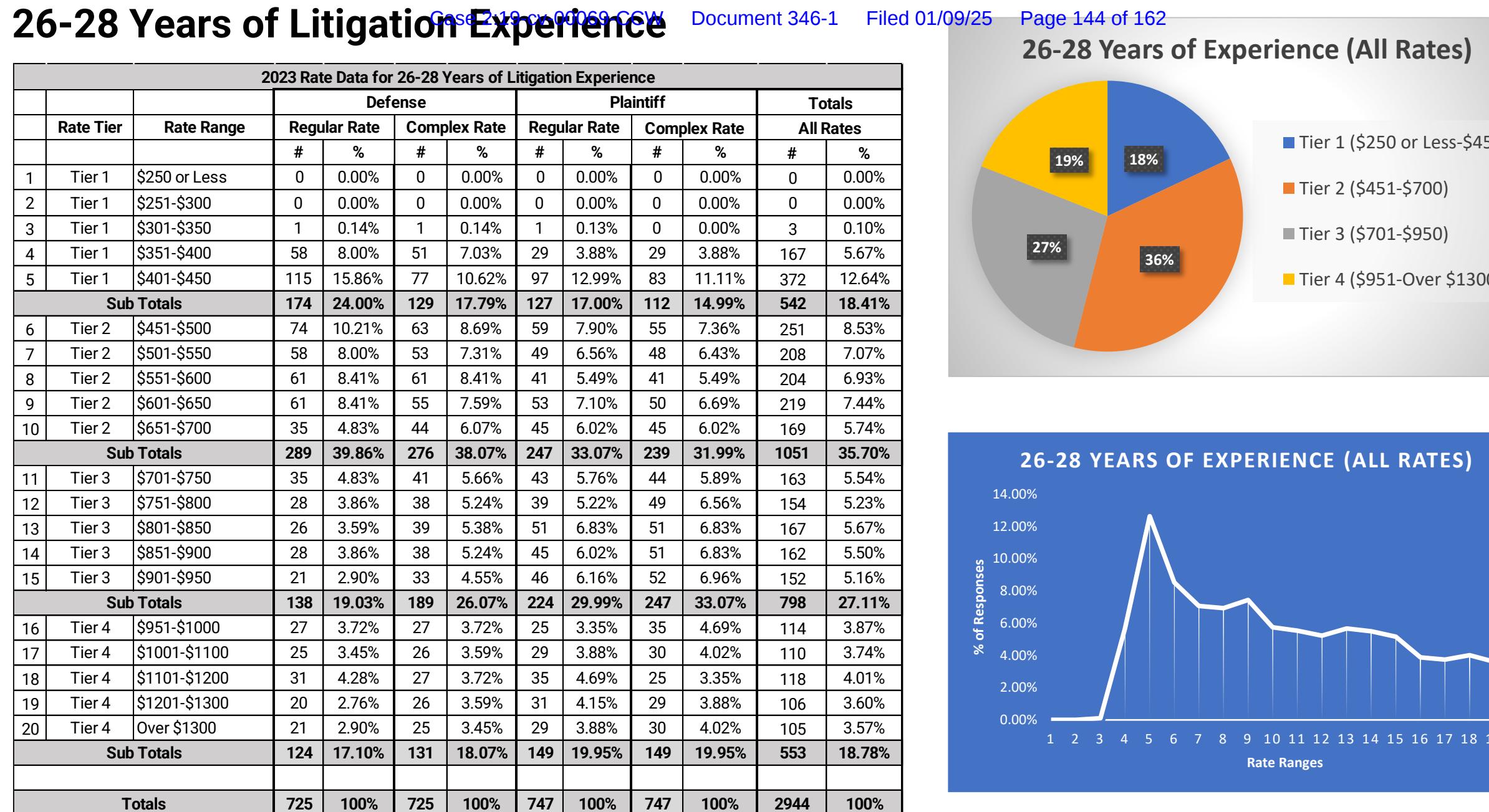
26-28 Years of Litigation Experience

Case 2:19-cv-00069-CCW

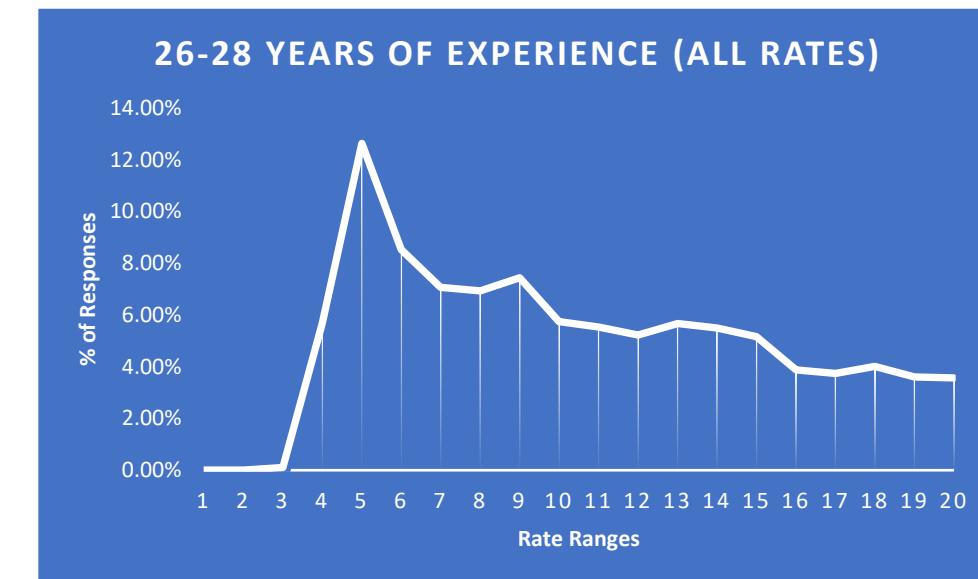
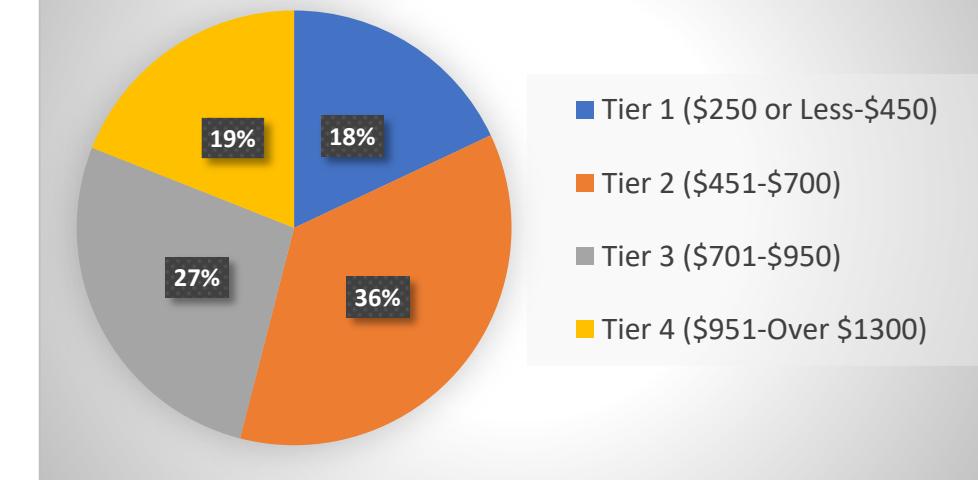
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26-28 Years of Experience (All Rates)



29-31 Years of Litigation Experience

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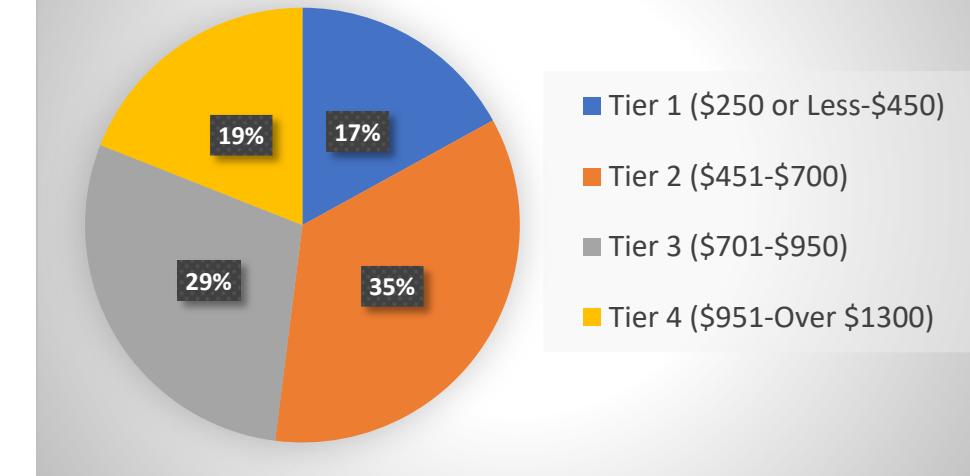
Document 346-1

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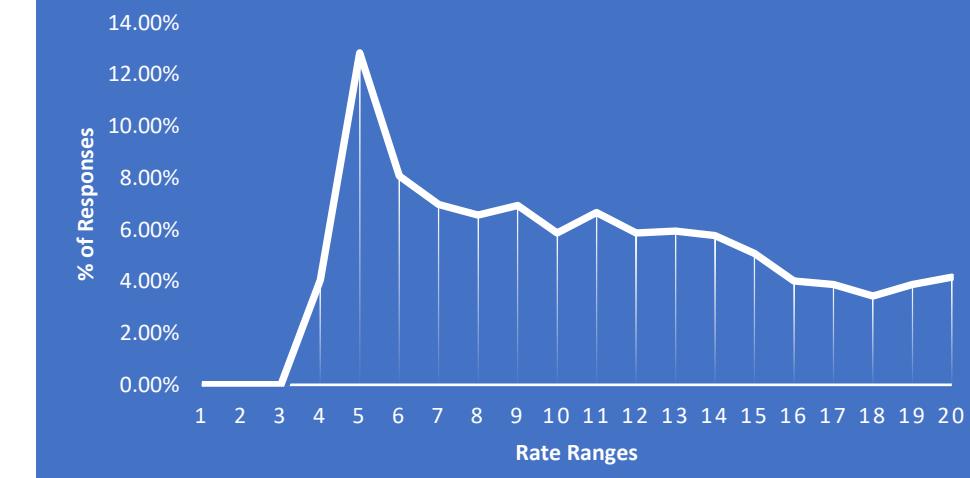
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2023 Rate Data for 29-31 Years of Litigation Experience												
			Defense		Plaintiff		Totals					
			Rate Tier	Rate Range	Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates	#	%	
1	Tier 1	\$250 or Less			0	0.00%	0	0.00%	0	0	0.00%	
2	Tier 1	\$251-\$300			0	0.00%	0	0.00%	0	0	0.00%	
3	Tier 1	\$301-\$350			0	0.00%	0	0.00%	0	0	0.00%	
4	Tier 1	\$351-\$400			41	5.73%	44	6.15%	15	2.03%	18	2.43%
5	Tier 1	\$401-\$450			116	16.20%	70	9.78%	103	13.92%	85	11.49%
Sub Totals					157	21.93%	114	15.92%	118	15.95%	103	13.92%
										492	16.90%	
6	Tier 2	\$451-\$500			66	9.22%	63	8.80%	48	6.49%	58	7.84%
7	Tier 2	\$501-\$550			56	7.82%	55	7.68%	46	6.22%	46	6.22%
8	Tier 2	\$551-\$600			58	8.10%	51	7.12%	41	5.54%	41	5.54%
9	Tier 2	\$601-\$650			56	7.82%	53	7.40%	48	6.49%	45	6.08%
10	Tier 2	\$651-\$700			43	6.01%	43	6.01%	46	6.22%	39	5.27%
Sub Totals					279	38.97%	265	37.01%	229	30.95%	229	30.95%
										1002	34.41%	
11	Tier 3	\$701-\$750			41	5.73%	43	6.01%	55	7.43%	55	7.43%
12	Tier 3	\$751-\$800			31	4.33%	39	5.45%	50	6.76%	51	6.89%
13	Tier 3	\$801-\$850			30	4.19%	41	5.73%	51	6.89%	51	6.89%
14	Tier 3	\$851-\$900			29	4.05%	39	5.45%	48	6.49%	52	7.03%
15	Tier 3	\$901-\$950			27	3.77%	31	4.33%	40	5.41%	50	6.76%
Sub Totals					158	22.07%	193	26.96%	244	32.97%	259	35.00%
										854	29.33%	
16	Tier 4	\$951-\$1000			26	3.63%	28	3.91%	28	3.78%	35	4.73%
17	Tier 4	\$1001-\$1100			24	3.35%	29	4.05%	30	4.05%	30	4.05%
18	Tier 4	\$1101-\$1200			22	3.07%	26	3.63%	27	3.65%	25	3.38%
19	Tier 4	\$1201-\$1300			24	3.35%	30	4.19%	29	3.92%	30	4.05%
20	Tier 4	Over \$1300			26	3.63%	31	4.33%	35	4.73%	29	3.92%
Sub Totals					122	17.04%	144	20.11%	149	20.14%	149	20.14%
										564	19.37%	
Totals					716	100%	716	100%	740	100%	740	100%
										2912	100%	

29-31 Years of Experience (All Rates)



29-31 YEARS OF EXPERIENCE (ALL RATES)



32-34 Years of Litigation Experience

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Document 346-1

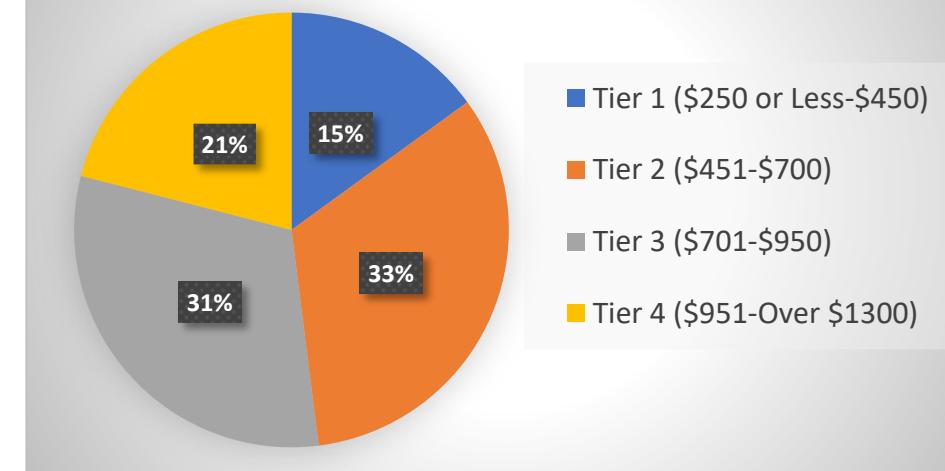
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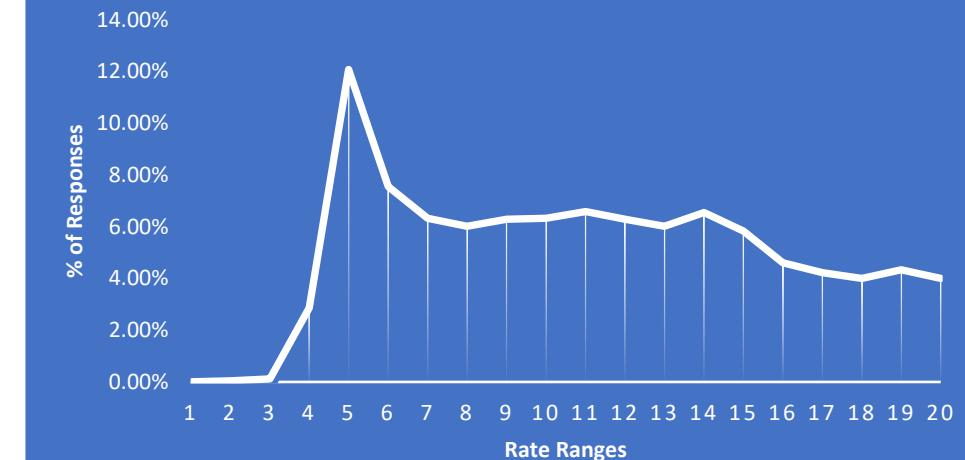
2023 Rate Data for 32-34 Years of Litigation Experience

Rate Tier	Rate Range	Defense		Plaintiff		Totals			
		Regular Rate		Complex Rate		Regular Rate		Complex Rate	
		#	%	#	%	#	%	#	%
1	Tier 1 \$250 or Less	0	0.00%	0	0.00%	0	0.00%	0	0.00%
2	Tier 1 \$251-\$300	0	0.00%	0	0.00%	1	0.14%	0	0.00%
3	Tier 1 \$301-\$350	0	0.00%	0	0.00%	1	0.14%	2	0.29%
4	Tier 1 \$351-\$400	33	5.40%	25	4.09%	10	1.43%	7	1.00%
5	Tier 1 \$401-\$450	89	14.57%	67	10.97%	86	12.27%	75	10.70%
Sub Totals		122	19.97%	92	15.06%	98	13.98%	84	11.98%
6	Tier 2 \$451-\$500	61	9.98%	41	6.71%	44	6.28%	52	7.42%
7	Tier 2 \$501-\$550	46	7.53%	44	7.20%	35	4.99%	41	5.85%
8	Tier 2 \$551-\$600	43	7.04%	48	7.86%	31	4.42%	36	5.14%
9	Tier 2 \$601-\$650	41	6.71%	44	7.20%	39	5.56%	41	5.85%
10	Tier 2 \$651-\$700	41	6.71%	45	7.36%	47	6.70%	33	4.71%
Sub Totals		232	37.97%	222	36.33%	196	27.96%	203	28.96%
11	Tier 3 \$701-\$750	35	5.73%	30	4.91%	53	7.56%	55	7.85%
12	Tier 3 \$751-\$800	29	4.75%	37	6.06%	49	6.99%	50	7.13%
13	Tier 3 \$801-\$850	32	5.24%	35	5.73%	46	6.56%	45	6.42%
14	Tier 3 \$851-\$900	29	4.75%	40	6.55%	49	6.99%	54	7.70%
15	Tier 3 \$901-\$950	22	3.60%	35	5.73%	48	6.85%	48	6.85%
Sub Totals		147	24.06%	177	28.97%	245	34.95%	252	35.95%
16	Tier 4 \$951-\$1000	24	3.93%	28	4.58%	34	4.85%	35	4.99%
17	Tier 4 \$1001-\$1100	23	3.76%	24	3.93%	32	4.56%	32	4.56%
18	Tier 4 \$1101-\$1200	20	3.27%	21	3.44%	31	4.42%	33	4.71%
19	Tier 4 \$1201-\$1300	22	3.60%	24	3.93%	36	5.14%	32	4.56%
20	Tier 4 Over \$1300	21	3.44%	25	4.09%	29	4.14%	30	4.28%
Sub Totals		110	18.00%	122	19.97%	162	23.11%	162	23.11%
Totals		611	100%	611	100%	701	100%	701	100%

32-34 Years of Experience (All Rates)



32-34 YEARS OF EXPERIENCE (ALL RATES)



35-37 Years of Litigation Experience

Case 2:19-cv-00069-CCW

Document 346-1

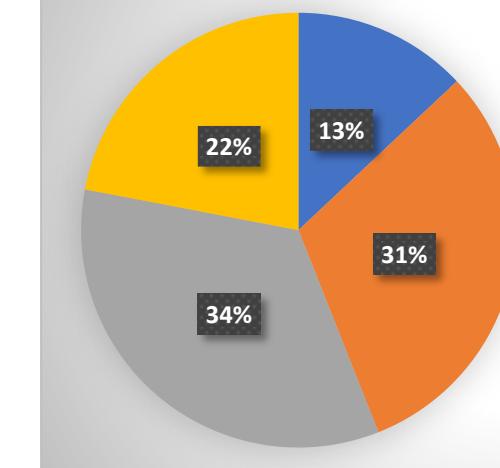
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2023 Rate Data for 35-37 Years of Litigation Experience

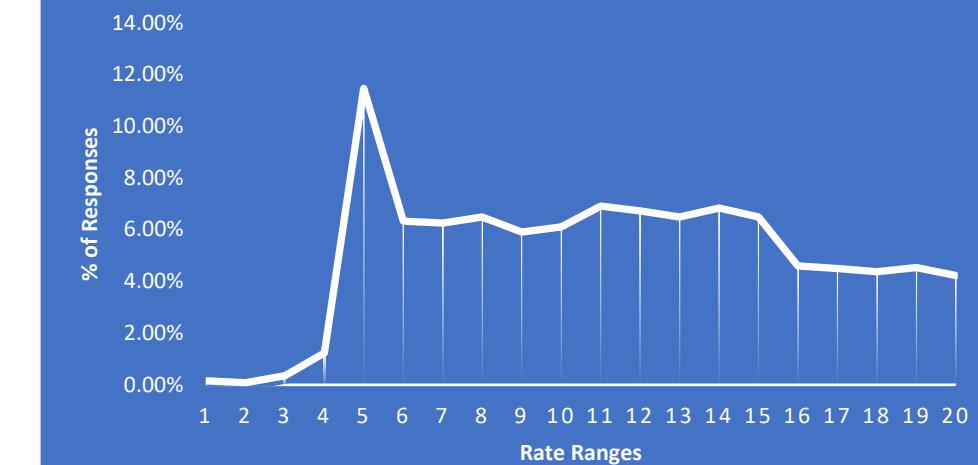
Rate Tier	Rate Range	Defense		Plaintiff		Totals	
		Regular Rate		Complex Rate		Regular Rate	
		#	%	#	%	#	%
1	Tier 1 \$250 or Less	2	0.34%	1	0.17%	1	0.14%
2	Tier 1 \$251-\$300	1	0.17%	0	0.00%	0	0.00%
3	Tier 1 \$301-\$350	3	0.51%	2	0.34%	1	0.14%
4	Tier 1 \$351-\$400	11	1.87%	12	2.04%	5	0.70%
5	Tier 1 \$401-\$450	87	14.77%	62	10.53%	79	11.06%
Sub Totals		104	17.66%	77	13.07%	86	12.04%
6	Tier 2 \$451-\$500	41	6.96%	32	5.43%	44	6.16%
7	Tier 2 \$501-\$550	42	7.13%	40	6.79%	41	5.74%
8	Tier 2 \$551-\$600	44	7.47%	55	9.34%	31	4.34%
9	Tier 2 \$601-\$650	43	7.30%	32	5.43%	39	5.46%
10	Tier 2 \$651-\$700	48	8.15%	41	6.96%	38	5.32%
Sub Totals		218	37.01%	200	33.96%	193	27.03%
11	Tier 3 \$701-\$750	29	4.92%	30	5.09%	57	7.98%
12	Tier 3 \$751-\$800	32	5.43%	36	6.11%	53	7.42%
13	Tier 3 \$801-\$850	31	5.26%	32	5.43%	55	7.70%
14	Tier 3 \$851-\$900	32	5.43%	38	6.45%	49	6.86%
15	Tier 3 \$901-\$950	35	5.94%	41	6.96%	50	7.00%
Sub Totals		159	26.99%	177	30.05%	264	36.97%
16	Tier 4 \$951-\$1000	26	4.41%	25	4.24%	39	5.46%
17	Tier 4 \$1001-\$1100	22	3.74%	27	4.58%	35	4.90%
18	Tier 4 \$1101-\$1200	17	2.89%	30	5.09%	31	4.34%
19	Tier 4 \$1201-\$1300	22	3.74%	27	4.58%	34	4.76%
20	Tier 4 Over \$1300	21	3.57%	26	4.41%	32	4.48%
Sub Totals		108	18.34%	135	22.92%	171	23.95%
Totals		589	100%	589	100%	714	100%
						714	100%
						2,606	100%

35-37 Years of Experience (All Rates)



- Tier 1 (\$250 or Less-\$450)
- Tier 2 (\$451-\$700)
- Tier 3 (\$701-\$950)
- Tier 4 (\$951-Over \$1300)

35-37 YEARS OF EXPERIENCE (ALL RATES)



38-40 Years of Litigation Experience

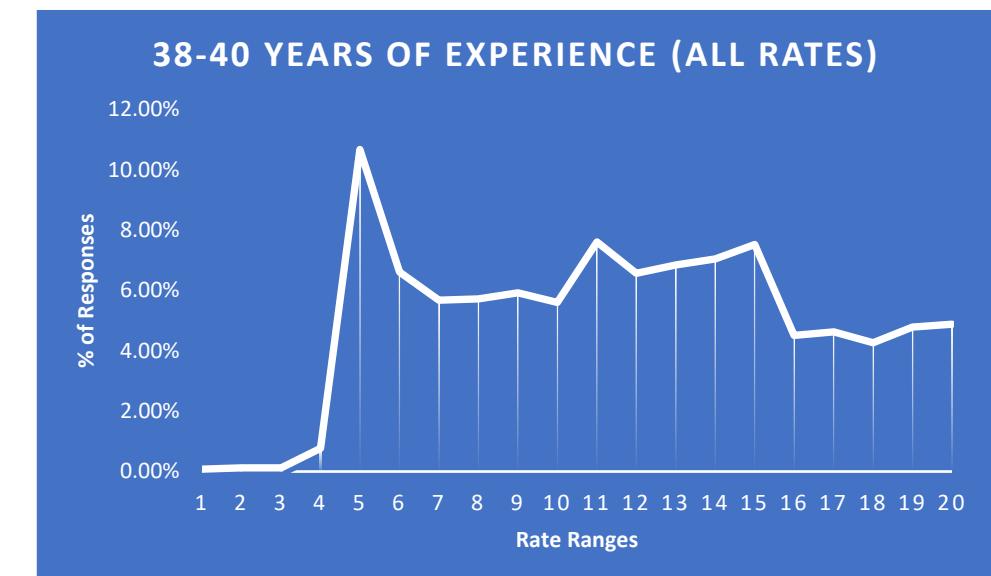
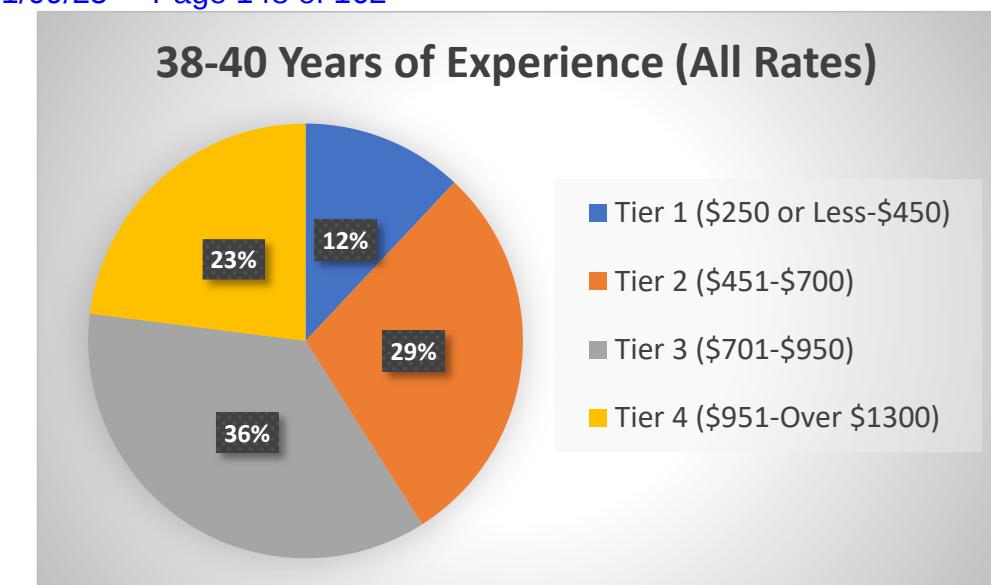
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2023 Rate Data for 38-40 Years of Litigation Experience											
Rate Tier	Rate Range	Defense		Plaintiff		Totals					
		Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates					
#	%	#	%	#	%	#	%	#	%	#	%
1	Tier 1 \$250 or Less	0	0.00%	1	0.18%	1	0.14%	0	0.00%	2	0.08%
2	Tier 1 \$251-\$300	0	0.00%	0	0.00%	2	0.29%	1	0.14%	3	0.12%
3	Tier 1 \$301-\$350	1	0.18%	1	0.18%	1	0.14%	0	0.00%	3	0.12%
4	Tier 1 \$351-\$400	6	1.09%	8	1.46%	3	0.43%	2	0.29%	19	0.77%
5	Tier 1 \$401-\$450	81	14.75%	56	10.20%	69	9.97%	59	8.53%	265	10.68%
Sub Totals		88	16.03%	66	12.02%	76	10.98%	62	8.96%	292	11.76%
6	Tier 2 \$451-\$500	45	8.20%	45	8.20%	41	5.92%	33	4.77%	164	6.61%
7	Tier 2 \$501-\$550	40	7.29%	34	6.19%	38	5.49%	29	4.19%	141	5.68%
8	Tier 2 \$551-\$600	39	7.10%	31	5.65%	31	4.48%	41	5.92%	142	5.72%
9	Tier 2 \$601-\$650	39	7.10%	35	6.38%	37	5.35%	36	5.20%	147	5.92%
10	Tier 2 \$651-\$700	35	6.38%	31	5.65%	33	4.77%	40	5.78%	139	5.60%
Sub Totals		198	36.07%	176	32.06%	180	26.01%	179	25.87%	733	29.53%
11	Tier 3 \$701-\$750	36	6.56%	27	4.92%	60	8.67%	66	9.54%	189	7.61%
12	Tier 3 \$751-\$800	31	5.65%	35	6.38%	53	7.66%	44	6.36%	163	6.57%
13	Tier 3 \$801-\$850	32	5.83%	32	5.83%	51	7.37%	55	7.95%	170	6.85%
14	Tier 3 \$851-\$900	26	4.74%	40	7.29%	55	7.95%	54	7.80%	175	7.05%
15	Tier 3 \$901-\$950	29	5.28%	41	7.47%	58	8.38%	59	8.53%	187	7.53%
Sub Totals		154	28.05%	175	31.88%	277	40.03%	278	40.17%	884	35.62%
16	Tier 4 \$951-\$1000	25	4.55%	21	3.83%	33	4.77%	33	4.77%	112	4.51%
17	Tier 4 \$1001-\$1100	22	4.01%	26	4.74%	32	4.62%	35	5.06%	115	4.63%
18	Tier 4 \$1101-\$1200	21	3.83%	25	4.55%	29	4.19%	31	4.48%	106	4.27%
19	Tier 4 \$1201-\$1300	22	4.01%	29	5.28%	32	4.62%	36	5.20%	119	4.79%
20	Tier 4 Over \$1300	19	3.46%	31	5.65%	33	4.77%	38	5.49%	121	4.88%
Sub Totals		109	19.85%	132	24.04%	159	22.98%	173	25.00%	573	23.09%
Totals		549	100%	549	100%	692	100%	692	100%	2482	100%



41-43 Years of Litigation Experience

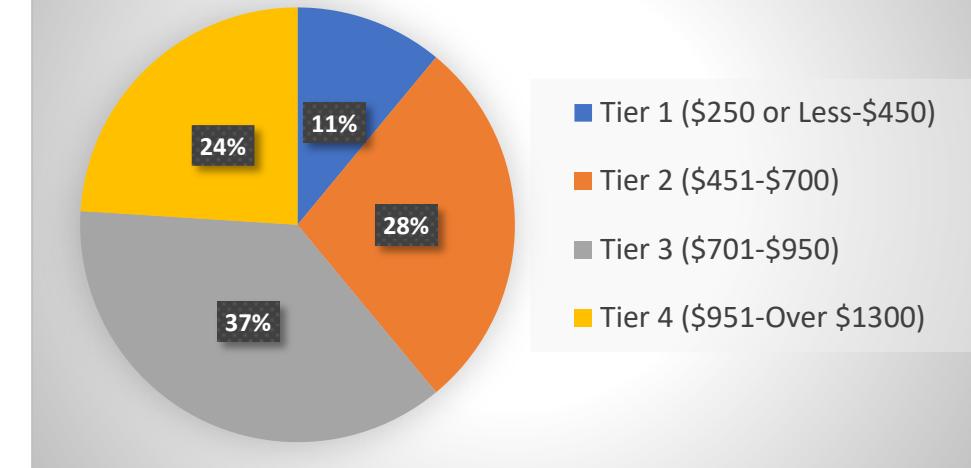
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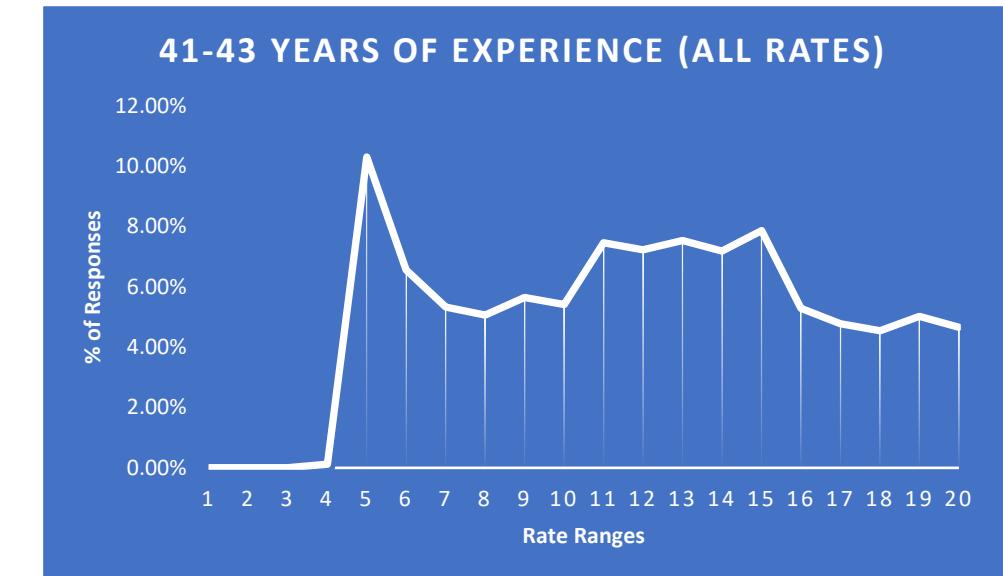
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41-43 Years of Experience (All Rates)



2023 Rate Data for 41-43 Years of Litigation Experience

			Defense		Plaintiff		Totals	
			Regular Rate		Complex Rate		Regular Rate	
			#	%	#	%	#	%
1	Tier 1	\$250 or Less	0	0.00%	0	0.00%	0	0.00%
2	Tier 1	\$251-\$300	0	0.00%	0	0.00%	0	0.00%
3	Tier 1	\$301-\$350	0	0.00%	0	0.00%	0	0.00%
4	Tier 1	\$351-\$400	2	0.33%	1	0.17%	0	0.00%
5	Tier 1	\$401-\$450	82	13.67%	59	9.83%	67	10.06%
Sub Totals			84	14.00%	60	10.00%	67	10.06%
6	Tier 2	\$451-\$500	45	7.50%	45	7.50%	45	6.76%
7	Tier 2	\$501-\$550	42	7.00%	36	6.00%	25	3.75%
8	Tier 2	\$551-\$600	41	6.83%	31	5.17%	31	4.65%
9	Tier 2	\$601-\$650	43	7.17%	36	6.00%	32	4.80%
10	Tier 2	\$651-\$700	39	6.50%	32	5.33%	27	4.05%
Sub Totals			210	35.00%	180	30.00%	160	24.02%
11	Tier 3	\$701-\$750	39	6.50%	41	6.83%	51	7.66%
12	Tier 3	\$751-\$800	30	5.00%	42	7.00%	55	8.26%
13	Tier 3	\$801-\$850	37	6.17%	41	6.83%	57	8.56%
14	Tier 3	\$851-\$900	38	6.33%	42	7.00%	51	7.66%
15	Tier 3	\$901-\$950	36	6.00%	44	7.33%	59	8.86%
Sub Totals			180	30.00%	210	35.00%	273	40.99%
16	Tier 4	\$951-\$1000	29	4.83%	38	6.33%	29	4.35%
17	Tier 4	\$1001-\$1100	27	4.50%	26	4.33%	33	4.95%
18	Tier 4	\$1101-\$1200	22	3.67%	30	5.00%	31	4.65%
19	Tier 4	\$1201-\$1300	26	4.33%	28	4.67%	38	5.71%
20	Tier 4	Over \$1300	22	3.67%	28	4.67%	35	5.26%
Sub Totals			126	21.00%	150	25.00%	166	24.92%
Totals			600	100%	600	100%	666	100%
Totals			600	100%	600	100%	666	100%



44-46 Years of Litigation Experience

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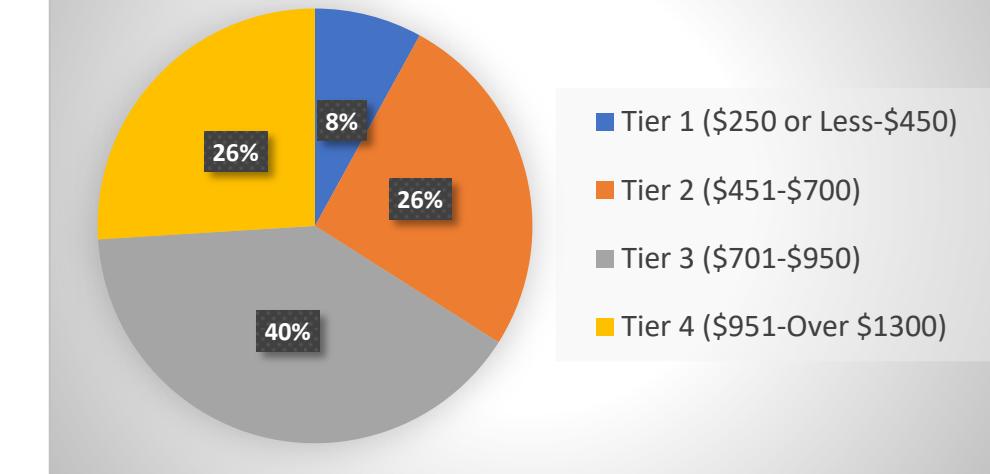
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2023 Rate Data for 44-46 Years of Litigation Experience

			Defense		Plaintiff		Totals			
			Rate Tier	Rate Range	Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates	
			#	%	#	%	#	%	#	%
1	Tier 1	\$250 or Less	0	0.00%	0	0.00%	0	0.00%	0	0.00%
2	Tier 1	\$251-\$300	0	0.00%	0	0.00%	0	0.00%	0	0.00%
3	Tier 1	\$301-\$350	0	0.00%	0	0.00%	0	0.00%	0	0.00%
4	Tier 1	\$351-\$400	0	0.00%	0	0.00%	2	0.31%	0	0.00%
5	Tier 1	\$401-\$450	67	11.99%	50	8.94%	50	7.67%	39	5.98%
Sub Totals			67	11.99%	50	8.94%	52	7.98%	39	5.98%
6	Tier 2	\$451-\$500	33	5.90%	31	5.55%	25	3.83%	19	2.91%
7	Tier 2	\$501-\$550	39	6.98%	32	5.72%	29	4.45%	29	4.45%
8	Tier 2	\$551-\$600	37	6.62%	29	5.19%	25	3.83%	29	4.45%
9	Tier 2	\$601-\$650	35	6.26%	31	5.55%	29	4.45%	31	4.75%
10	Tier 2	\$651-\$700	41	7.33%	33	5.90%	35	5.37%	35	5.37%
Sub Totals			185	33.09%	156	27.91%	143	21.93%	143	21.93%
11	Tier 3	\$701-\$750	45	8.05%	48	8.59%	43	6.60%	44	6.75%
12	Tier 3	\$751-\$800	36	6.44%	41	7.33%	56	8.59%	57	8.74%
13	Tier 3	\$801-\$850	42	7.51%	42	7.51%	61	9.36%	63	9.66%
14	Tier 3	\$851-\$900	29	5.19%	45	8.05%	50	7.67%	58	8.90%
15	Tier 3	\$901-\$950	31	5.55%	36	6.44%	70	10.74%	65	9.97%
Sub Totals			183	32.74%	212	37.92%	280	42.94%	287	44.02%
16	Tier 4	\$951-\$1000	31	5.55%	25	4.47%	31	4.75%	33	5.06%
17	Tier 4	\$1001-\$1100	25	4.47%	28	5.01%	35	5.37%	36	5.52%
18	Tier 4	\$1101-\$1200	22	3.94%	28	5.01%	33	5.06%	34	5.21%
19	Tier 4	\$1201-\$1300	25	4.47%	29	5.19%	37	5.67%	32	4.91%
20	Tier 4	Over \$1300	21	3.76%	31	5.55%	41	6.29%	48	7.36%
Sub Totals			124	22.18%	141	25.22%	177	27.15%	183	28.07%
Totals			559	100%	559	100%	652	100%	652	100%

44-46 Years of Experience (All Rates)



44-46 YEARS OF EXPERIENCE (ALL RATES)



47+ Years of Litigation Experience

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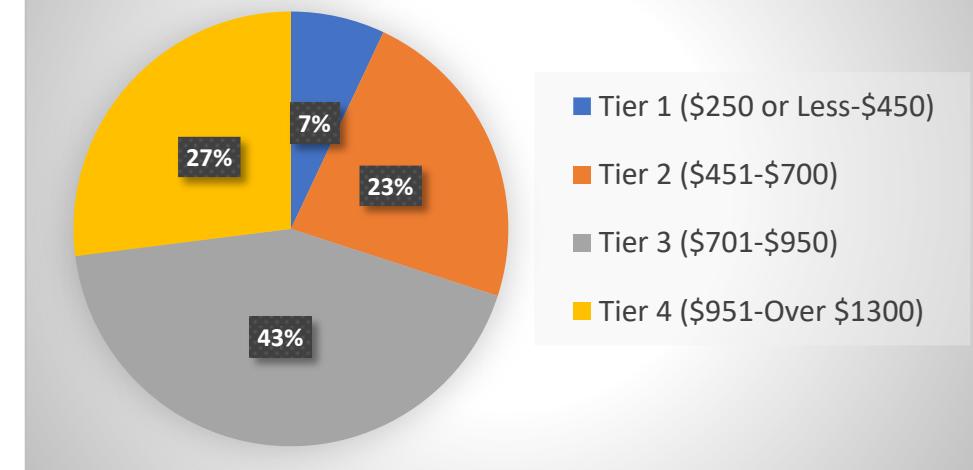
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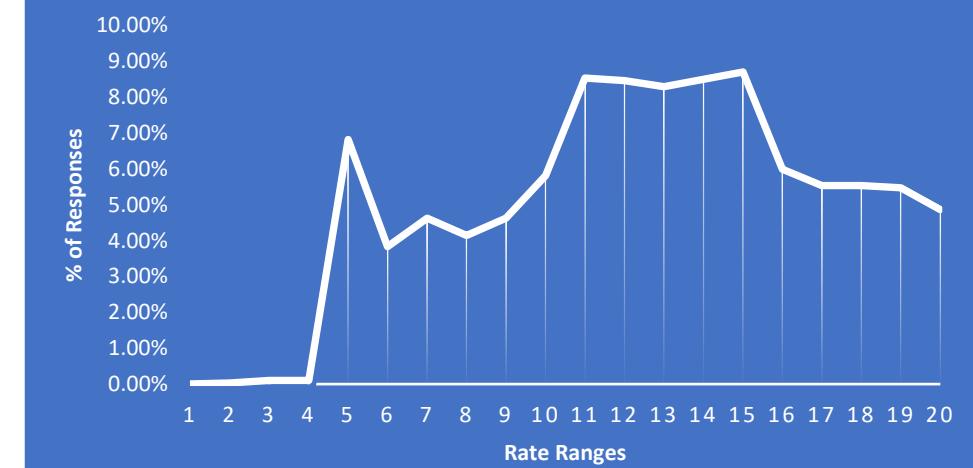
2023 Rate Data for 47+ Years of Litigation Experience

			Defense		Plaintiff		Totals			
			Rate Tier	Rate Range	Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates	
			#	%	#	%	#	%	#	%
1	Tier 1	\$250 or Less	0	0.00%	0	0.00%	0	0.00%	0	0.00%
2	Tier 1	\$251-\$300	0	0.00%	1	0.16%	0	0.00%	0	0.03%
3	Tier 1	\$301-\$350	1	0.16%	1	0.16%	1	0.13%	0	0.00%
4	Tier 1	\$351-\$400	0	0.00%	1	0.16%	0	0.00%	2	0.25%
5	Tier 1	\$401-\$450	63	9.77%	49	7.60%	46	5.82%	38	4.80%
Sub Totals			64	9.92%	52	8.06%	47	5.94%	40	5.06%
6	Tier 2	\$451-\$500	20	3.10%	33	5.12%	29	3.67%	28	3.54%
7	Tier 2	\$501-\$550	39	6.05%	31	4.81%	35	4.42%	28	3.54%
8	Tier 2	\$551-\$600	32	4.96%	34	5.27%	29	3.67%	24	3.03%
9	Tier 2	\$601-\$650	44	6.82%	29	4.50%	31	3.92%	29	3.67%
10	Tier 2	\$651-\$700	59	9.15%	41	6.36%	34	4.30%	33	4.17%
Sub Totals			194	30.08%	168	26.05%	158	19.97%	142	17.95%
11	Tier 3	\$701-\$750	52	8.06%	45	6.98%	66	8.34%	82	10.37%
12	Tier 3	\$751-\$800	45	6.98%	48	7.44%	71	8.98%	79	9.99%
13	Tier 3	\$801-\$850	41	6.36%	55	8.53%	68	8.60%	74	9.36%
14	Tier 3	\$851-\$900	43	6.67%	51	7.91%	71	8.98%	79	9.99%
15	Tier 3	\$901-\$950	45	6.98%	59	9.15%	80	10.11%	66	8.34%
Sub Totals			226	35.04%	258	40.00%	356	45.01%	380	48.04%
16	Tier 4	\$951-\$1000	28	4.34%	44	6.82%	49	6.19%	51	6.45%
17	Tier 4	\$1001-\$1100	41	6.36%	28	4.34%	46	5.82%	44	5.56%
18	Tier 4	\$1101-\$1200	31	4.81%	31	4.81%	43	5.44%	54	6.83%
19	Tier 4	\$1201-\$1300	32	4.96%	35	5.43%	50	6.32%	40	5.06%
20	Tier 4	Over \$1300	29	4.50%	29	4.50%	42	5.31%	40	5.06%
Sub Totals			161	24.96%	167	25.89%	230	29.08%	229	28.95%
Totals			645	100%	645	100%	791	100%	791	100%

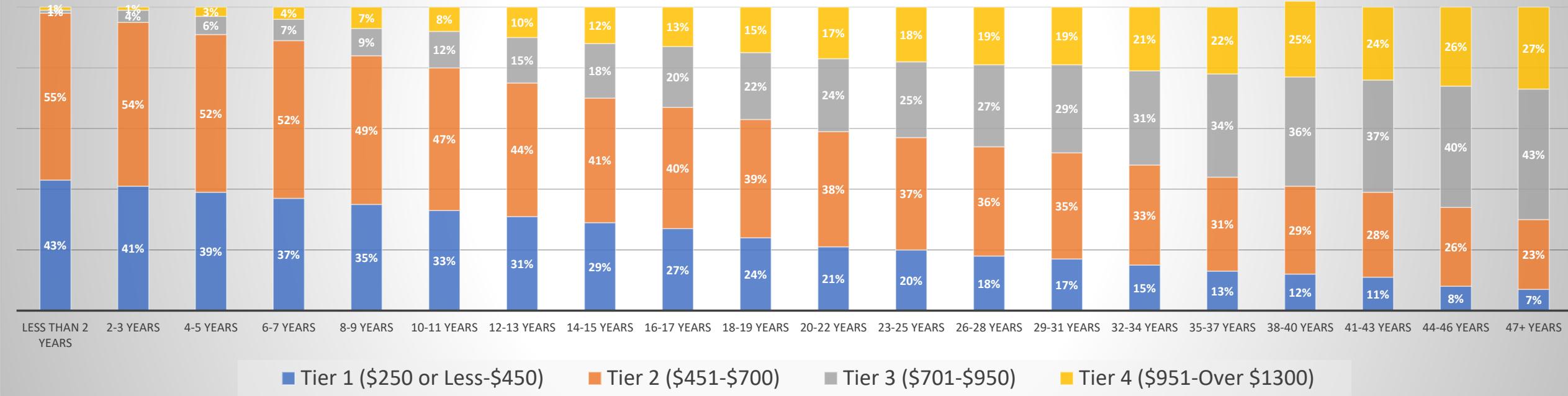
47+ Years of Experience (All Rates)



47+ YEARS OF EXPERIENCE (ALL RATES)



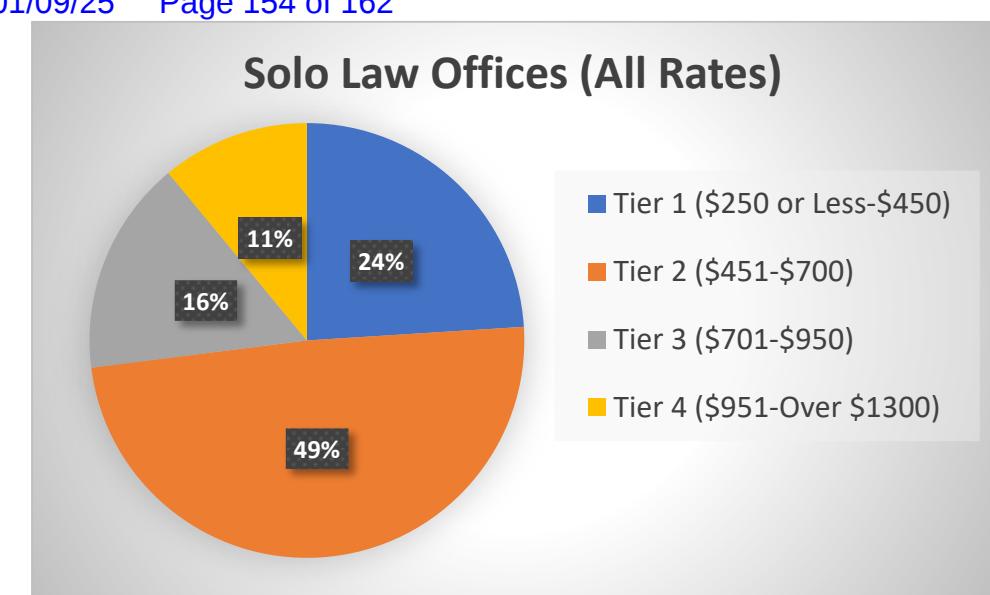
Years of Litigation Experience by Tier System (2023)



Law Firm / Law Office Size

2023 Rate Data for Solo Law Offices (1 Atty)

			Defense				Plaintiffs				All	
	Rate Tier	Rate Range	Regular Rate		Complex Rate		Regular Rate		Complex Rate		All Rates	
			#	%	#	%	#	%	#	%	#	%
1	Tier 1	\$250 or Less	45	2.29%	36	1.83%	46	2.08%	46	2.08%	173	2.07%
2	Tier 1	\$251-\$300	68	3.47%	73	3.72%	75	3.39%	75	3.39%	291	3.49%
3	Tier 1	\$301-\$350	89	4.54%	94	4.79%	101	4.57%	101	4.57%	385	4.61%
4	Tier 1	\$351-\$400	125	6.37%	118	6.01%	142	6.42%	142	6.42%	527	6.31%
5	Tier 1	\$401-\$450	163	8.31%	130	6.63%	167	7.55%	167	7.55%	627	7.51%
Sub Totals			490	24.97%	451	22.99%	531	24.01%	531	24.01%	2003	23.99%
6	Tier 2	\$451-\$500	223	11.37%	215	10.96%	222	10.04%	222	10.04%	882	10.57%
7	Tier 2	\$501-\$550	216	11.01%	209	10.65%	215	9.72%	215	9.72%	855	10.24%
8	Tier 2	\$551-\$600	208	10.60%	211	10.75%	216	9.76%	216	9.76%	851	10.19%
9	Tier 2	\$601-\$650	197	10.04%	175	8.92%	212	9.58%	212	9.58%	796	9.54%
10	Tier 2	\$651-\$700	137	6.98%	164	8.36%	197	8.91%	197	8.91%	695	8.33%
Sub Totals			981	50.00%	974	49.64%	1062	48.01%	1062	48.01%	4079	48.86%
11	Tier 3	\$701-\$750	75	3.82%	77	3.92%	97	4.39%	97	4.39%	346	4.14%
12	Tier 3	\$751-\$800	58	2.96%	63	3.21%	69	3.12%	69	3.12%	259	3.10%
13	Tier 3	\$801-\$850	61	3.11%	70	3.57%	66	2.98%	66	2.98%	263	3.15%
14	Tier 3	\$851-\$900	60	3.06%	64	3.26%	71	3.21%	71	3.21%	266	3.19%
15	Tier 3	\$901-\$950	41	2.09%	47	2.40%	51	2.31%	51	2.31%	190	2.28%
Sub Totals			295	15.04%	321	16.36%	354	16.00%	354	16.00%	1324	15.86%
16	Tier 4	\$951-\$1000	45	2.29%	49	2.50%	59	2.67%	59	2.67%	212	2.54%
17	Tier 4	\$1001-\$1100	41	2.09%	41	2.09%	53	2.40%	53	2.40%	188	2.25%
18	Tier 4	\$1101-\$1200	42	2.14%	51	2.60%	56	2.53%	56	2.53%	205	2.46%
19	Tier 4	\$1201-\$1300	39	1.99%	43	2.19%	53	2.40%	53	2.40%	188	2.25%
20	Tier 4	Over \$1300	29	1.48%	32	1.63%	44	1.99%	44	1.99%	149	1.78%
Sub Totals			196	9.99%	216	11.01%	265	11.98%	265	11.98%	942	11.28%
Totals			1962	100%	1962	100%	2212	100%	2212	100%	8348	100%



Law Offices (2-11 Attys)

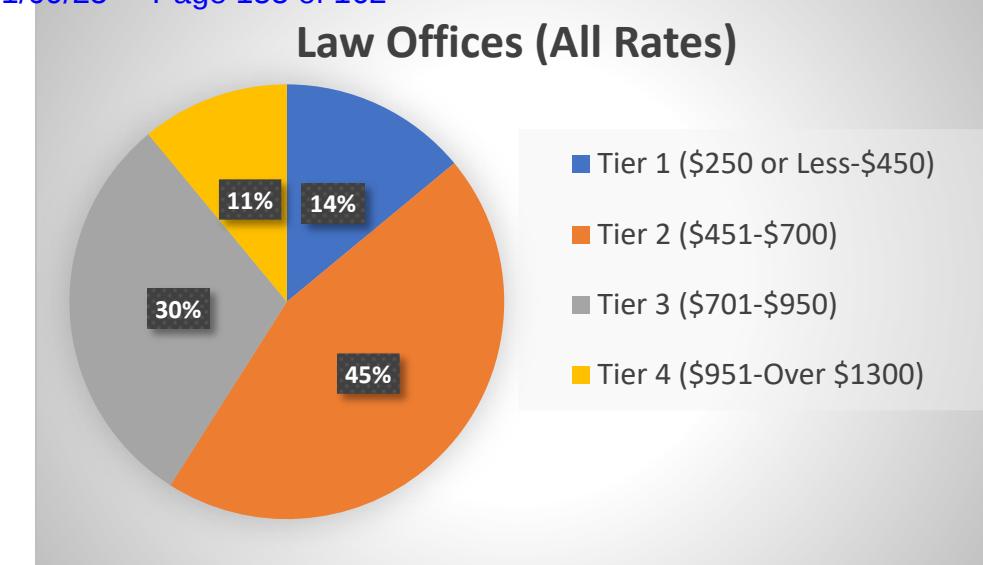
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2023 Rate Data for Law Offices (2-11 Attys)												
		Defense				Plaintiffs				All		
	Rate Tier	Rate Range	Regular Rate		Complex Rate		Regular Rate		Complex Rate		All Rates	
			#	%	#	%	#	%	#	%	#	%
1	Tier 1	\$250 or Less	25	1.04%	25	1.04%	17	0.68%	11	0.44%	78	0.79%
2	Tier 1	\$251-\$300	45	1.87%	45	1.87%	25	1.00%	17	0.68%	132	1.34%
3	Tier 1	\$301-\$350	55	2.29%	55	2.29%	33	1.32%	23	0.92%	166	1.69%
4	Tier 1	\$351-\$400	71	2.95%	71	2.95%	46	1.84%	38	1.52%	226	2.30%
5	Tier 1	\$401-\$450	165	6.86%	165	6.86%	229	9.15%	209	8.35%	768	7.82%
Sub Totals		361	15.02%	361	15.02%	350	13.98%	298	11.90%	1370	13.96%	
6	Tier 2	\$451-\$500	241	10.02%	241	10.02%	245	9.78%	236	9.42%	963	9.81%
7	Tier 2	\$501-\$550	233	9.69%	233	9.69%	213	8.51%	210	8.39%	889	9.06%
8	Tier 2	\$551-\$600	221	9.19%	221	9.19%	233	9.31%	203	8.11%	878	8.94%
9	Tier 2	\$601-\$650	215	8.94%	215	8.94%	200	7.99%	208	8.31%	838	8.54%
10	Tier 2	\$651-\$700	196	8.15%	196	8.15%	211	8.43%	195	7.79%	798	8.13%
Sub Totals		1106	46.01%	1106	46.01%	1102	44.01%	1052	42.01%	4366	44.48%	
11	Tier 3	\$701-\$750	168	6.99%	168	6.99%	150	5.99%	183	7.31%	669	6.82%
12	Tier 3	\$751-\$800	145	6.03%	145	6.03%	161	6.43%	171	6.83%	622	6.34%
13	Tier 3	\$801-\$850	144	5.99%	144	5.99%	145	5.79%	165	6.59%	598	6.09%
14	Tier 3	\$851-\$900	117	4.87%	117	4.87%	155	6.19%	176	7.03%	565	5.76%
15	Tier 3	\$901-\$950	122	5.07%	122	5.07%	140	5.59%	133	5.31%	517	5.27%
Sub Totals		696	28.95%	696	28.95%	751	29.99%	828	33.07%	2971	30.27%	
16	Tier 4	\$951-\$1000	61	2.54%	61	2.54%	72	2.88%	98	3.91%	292	2.97%
17	Tier 4	\$1001-\$1100	46	1.91%	46	1.91%	58	2.32%	50	2.00%	200	2.04%
18	Tier 4	\$1101-\$1200	51	2.12%	51	2.12%	55	2.20%	54	2.16%	211	2.15%
19	Tier 4	\$1201-\$1300	39	1.62%	39	1.62%	60	2.40%	64	2.56%	202	2.06%
20	Tier 4	Over \$1300	44	1.83%	44	1.83%	56	2.24%	60	2.40%	204	2.08%
Sub Totals		241	10.02%	241	10.02%	301	12.02%	326	13.02%	1109	11.30%	
Totals		2404	100%	2404	100%	2504	100%	2504	100%	9816	100%	

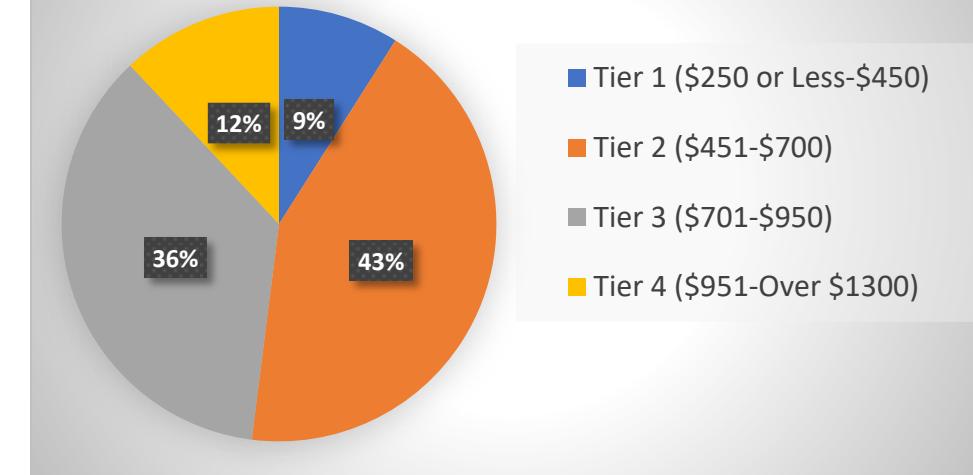


Small Law Firms (12-49 Attys)

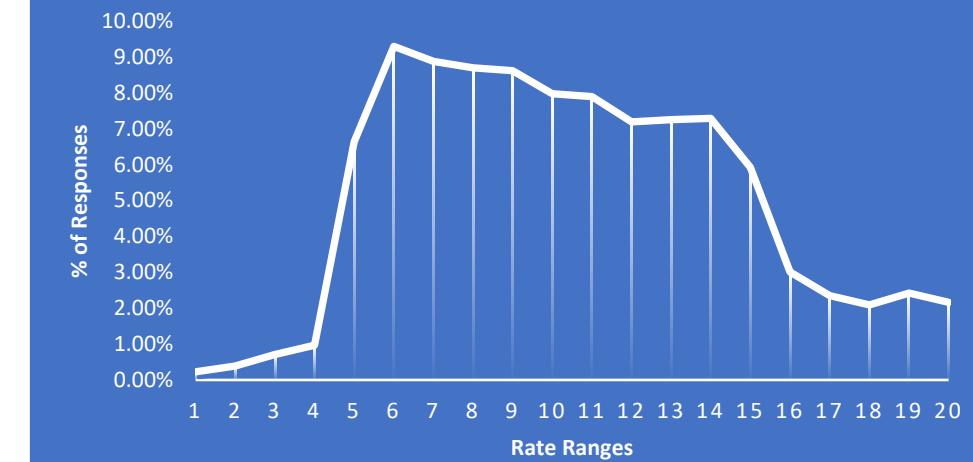
2023 Rate Data for Small Law Firms (12-49 Attys)

			Defense		Plaintiffs		All	
	Rate Tier	Rate Range	Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates	
			#	%	#	%	#	%
1	Tier 1	\$250 or Less	8	0.34%	5	0.21%	6	0.24%
2	Tier 1	\$251-\$300	12	0.51%	9	0.38%	11	0.43%
3	Tier 1	\$301-\$350	28	1.19%	17	0.73%	15	0.59%
4	Tier 1	\$351-\$400	33	1.41%	28	1.19%	22	0.87%
5	Tier 1	\$401-\$450	152	6.48%	151	6.44%	174	6.85%
Sub Totals			233	9.94%	210	8.96%	228	8.98%
6	Tier 2	\$451-\$500	245	10.45%	211	9.00%	213	8.39%
7	Tier 2	\$501-\$550	210	8.96%	206	8.79%	238	9.37%
8	Tier 2	\$551-\$600	215	9.17%	201	8.58%	222	8.74%
9	Tier 2	\$601-\$650	211	9.00%	206	8.79%	220	8.66%
10	Tier 2	\$651-\$700	175	7.47%	207	8.83%	199	7.83%
Sub Totals			1056	45.05%	1031	43.98%	1092	42.99%
11	Tier 3	\$701-\$750	183	7.81%	186	7.94%	212	8.35%
12	Tier 3	\$751-\$800	162	6.91%	171	7.30%	190	7.48%
13	Tier 3	\$801-\$850	155	6.61%	164	7.00%	188	7.40%
14	Tier 3	\$851-\$900	160	6.83%	168	7.17%	181	7.13%
15	Tier 3	\$901-\$950	137	5.84%	132	5.63%	144	5.67%
Sub Totals			797	34.00%	821	35.03%	915	36.02%
16	Tier 4	\$951-\$1000	64	2.73%	80	3.41%	71	2.80%
17	Tier 4	\$1001-\$1100	52	2.22%	51	2.18%	61	2.40%
18	Tier 4	\$1101-\$1200	44	1.88%	44	1.88%	55	2.17%
19	Tier 4	\$1201-\$1300	52	2.22%	56	2.39%	63	2.48%
20	Tier 4	Over \$1300	46	1.96%	51	2.18%	55	2.17%
Sub Totals			258	11.01%	282	12.03%	305	12.01%
Totals			2344	100%	2344	100%	2540	100%
							2540	100%
							9768	100%

Small Law Firms (All Rates)



SMALL LAW FIRMS (ALL RATES)



Mid-Size Law Firms (50-99 Attys)

Case 2:19-cv-00069-CCW

Document 346-1

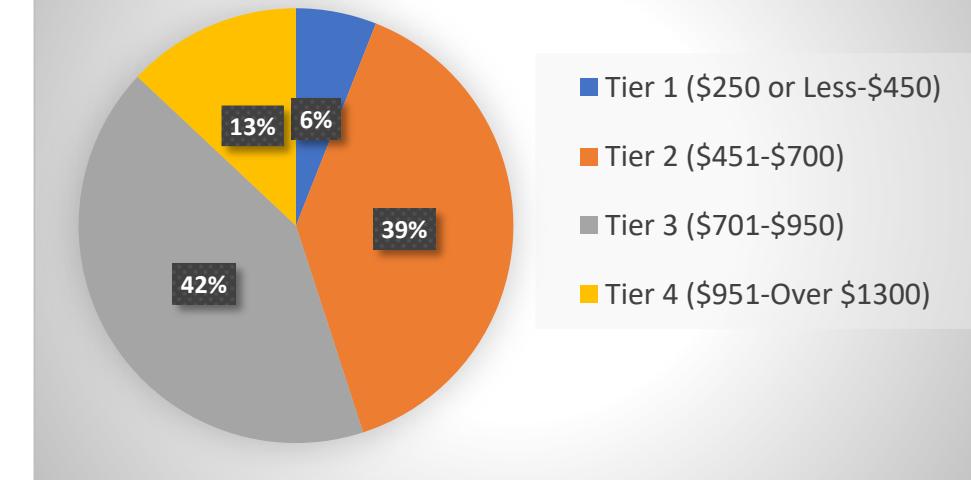
Filed 01/09/25

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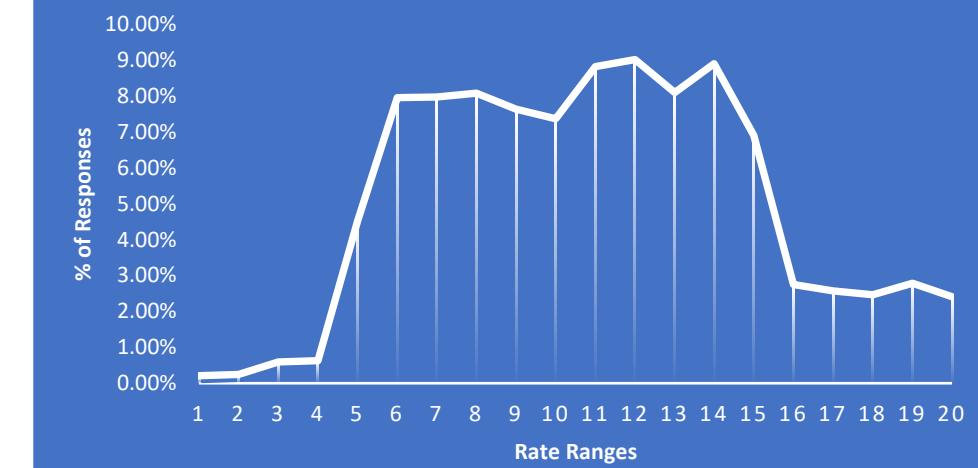
2023 Rate Data for Mid-Size Law Firms (50-99 Attys)

			Defense		Plaintiffs		All	
	Rate Tier	Rate Range	Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates	
			#	%	#	%	#	%
1	Tier 1	\$250 or Less	4	0.14%	4	0.14%	6	0.23%
2	Tier 1	\$251-\$300	6	0.22%	5	0.18%	7	0.27%
3	Tier 1	\$301-\$350	9	0.32%	11	0.39%	12	0.47%
4	Tier 1	\$351-\$400	9	0.32%	15	0.54%	21	0.82%
5	Tier 1	\$401-\$450	165	5.92%	132	4.74%	108	4.20%
Sub Totals			193	6.93%	167	6.00%	154	5.99%
6	Tier 2	\$451-\$500	233	8.37%	236	8.47%	215	8.37%
7	Tier 2	\$501-\$550	255	9.16%	217	7.79%	177	6.89%
8	Tier 2	\$551-\$600	235	8.44%	211	7.58%	221	8.60%
9	Tier 2	\$601-\$650	205	7.36%	222	7.97%	189	7.35%
10	Tier 2	\$651-\$700	187	6.71%	200	7.18%	201	7.82%
Sub Totals			1115	40.04%	1086	38.99%	1003	39.03%
11	Tier 3	\$701-\$750	267	9.59%	255	9.16%	209	8.13%
12	Tier 3	\$751-\$800	251	9.01%	294	10.56%	215	8.37%
13	Tier 3	\$801-\$850	221	7.94%	221	7.94%	211	8.21%
14	Tier 3	\$851-\$900	244	8.76%	289	10.38%	211	8.21%
15	Tier 3	\$901-\$950	159	5.71%	111	3.99%	233	9.07%
Sub Totals			1142	41.01%	1170	42.01%	1079	41.98%
16	Tier 4	\$951-\$1000	83	2.98%	84	3.02%	61	2.37%
17	Tier 4	\$1001-\$1100	66	2.37%	70	2.51%	67	2.61%
18	Tier 4	\$1101-\$1200	68	2.44%	66	2.37%	59	2.30%
19	Tier 4	\$1201-\$1300	67	2.41%	77	2.76%	78	3.04%
20	Tier 4	Over \$1300	51	1.83%	65	2.33%	69	2.68%
Sub Totals			335	12.03%	362	13.00%	334	13.00%
Totals			2,785	100%	2,570	100%	10,710	100%

Mid-Size Law Firms (All Rates)



MID-SIZE LAW FIRMS (ALL RATES)



Large Law Firms (100+ Attys)

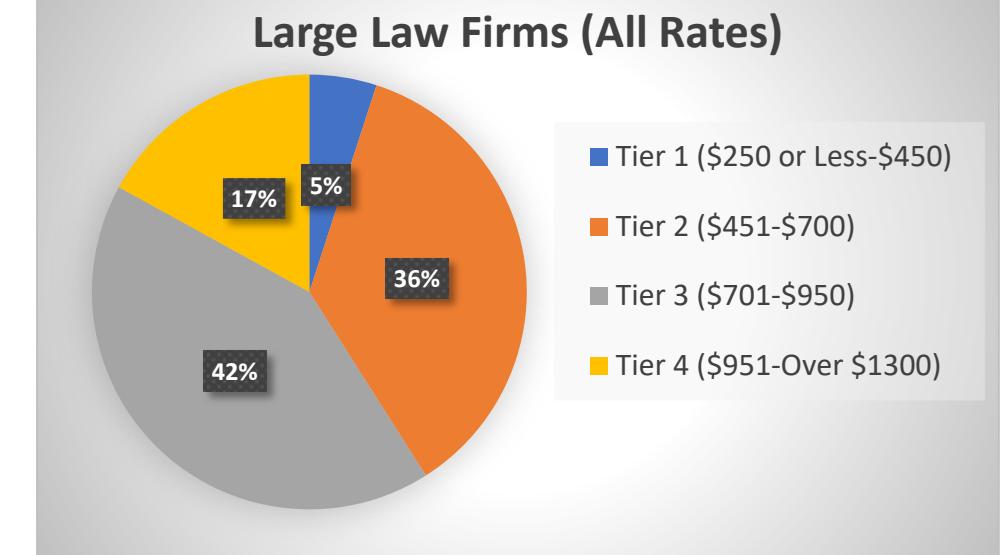
Case 2:18-cv-00069-CCW

Document 346-1

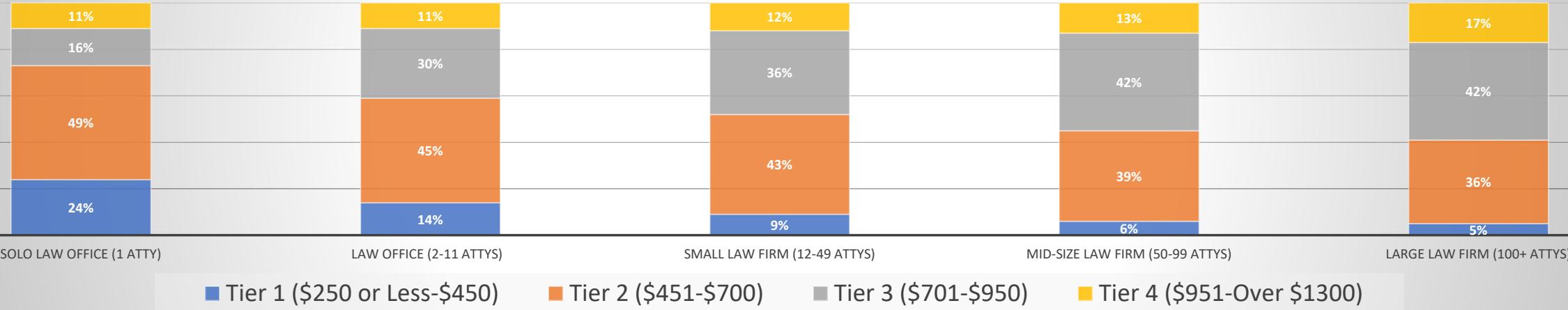
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2023 Rate Data from Large Law Firms (100+ Attys)												
			Defense			Plaintiffs			All			
Rate Tier	Rate Range	Regular Rate	Complex Rate	Regular Rate	Complex Rate	All Rates						
		#	%	#	%	#	%	#	%	#	%	
1	Tier 1	\$250 or Less	3	0.15%	4	0.20%	2	0.06%	0	0.00%	9	0.08%
2	Tier 1	\$251-\$300	6	0.30%	7	0.35%	5	0.14%	1	0.03%	19	0.17%
3	Tier 1	\$301-\$350	15	0.75%	11	0.55%	9	0.26%	2	0.06%	37	0.34%
4	Tier 1	\$351-\$400	21	1.05%	26	1.30%	19	0.54%	32	0.92%	98	0.89%
5	Tier 1	\$401-\$450	74	3.69%	51	2.55%	138	3.95%	103	2.95%	366	3.33%
Sub Totals			119	5.94%	99	4.94%	173	4.95%	138	3.95%	529	4.81%
6	Tier 2	\$451-\$500	176	8.79%	162	8.09%	267	7.64%	233	6.67%	838	7.62%
7	Tier 2	\$501-\$550	141	7.04%	148	7.39%	280	8.02%	244	6.99%	813	7.40%
8	Tier 2	\$551-\$600	166	8.29%	144	7.19%	222	6.36%	242	6.93%	774	7.04%
9	Tier 2	\$601-\$650	145	7.24%	146	7.29%	222	6.36%	251	7.19%	764	6.95%
10	Tier 2	\$651-\$700	132	6.59%	140	6.99%	265	7.59%	250	7.16%	787	7.16%
Sub Totals			760	37.94%	740	36.94%	1256	35.96%	1220	34.93%	3976	36.17%
11	Tier 3	\$701-\$750	156	7.79%	188	9.39%	355	10.16%	299	8.56%	998	9.08%
12	Tier 3	\$751-\$800	161	8.04%	160	7.99%	322	9.22%	306	8.76%	949	8.63%
13	Tier 3	\$801-\$850	174	8.69%	171	8.54%	349	9.99%	311	8.90%	1005	9.14%
14	Tier 3	\$851-\$900	171	8.54%	155	7.74%	212	6.07%	288	8.25%	826	7.51%
15	Tier 3	\$901-\$950	161	8.04%	169	8.44%	232	6.64%	301	8.62%	863	7.85%
Sub Totals			823	41.09%	843	42.09%	1470	42.08%	1505	43.09%	4641	42.22%
16	Tier 4	\$951-\$1000	80	3.99%	72	3.59%	145	4.15%	137	3.92%	434	3.95%
17	Tier 4	\$1001-\$1100	71	3.54%	70	3.49%	119	3.41%	126	3.61%	386	3.51%
18	Tier 4	\$1101-\$1200	50	2.50%	61	3.05%	113	3.24%	125	3.58%	349	3.18%
19	Tier 4	\$1201-\$1300	41	2.05%	63	3.15%	119	3.41%	130	3.72%	353	3.21%
20	Tier 4	Over \$1300	59	2.95%	55	2.75%	98	2.81%	112	3.21%	324	2.95%
Sub Totals			301	15.03%	321	16.03%	594	17.01%	630	18.04%	1846	16.79%
Totals			####	100%	2,003	100%	####	100%	3,493	100%	10,992	100%



Law Office / Law Firm Size by Tier System (2023)



Calculation Error Rate

This survey required thousands of mathematical calculations. Some of these calculations were performed by the Excel software and some by a calculator. While we double-checked our math, there is a small percentage that mathematical errors were made. There is a slightly higher chance that data entry errors were made. Whatever may be the cause of any error, please re-check our math before you cite any data in this survey. If you do spot any error or any discrepancy with our survey data please contact us.

Survey Tutorial

If you purchased this survey, that price includes a survey tutorial. There is a lot of data in this survey. We highly encourage you to schedule this survey tutorial so we can walk you through all the data. This tutorial never expires and can be scheduled at any time. This survey tutorial will guide you through the survey process and explain all the hourly rate data. We will also answer any and all questions you may have.

Survey Comments / Suggestions

We welcome your comments and/or suggestions.

If you have any comments or suggestions
about this hourly rate survey, please contact

NALFA Executive Director Terry Jesse at terry@thenalfa.org

or call us at (312) 907-7275. Thank You!